INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

AT&T JAPAN–U.S. CABLE NETWORK DECOMMISSIONING (JUS S8 AND JUS S9 CABLES) PROJECT

April 2026

Lead Agency:

California State Lands Commission
100 Howe Avenue, Suite 100 South
Sacramento, California 95825

Applicant:

AT&T Enterprises LLC

MISSION STATEMENT

The California State Lands Commission provides the people of California with effective stewardship of the lands, waterways, and resources entrusted to its care based on the principles of equity, sustainability, and resiliency, through preservation, restoration, enhancement, responsible economic development, and the promotion of public access.

CEQA DOCUMENT WEBSITE

www.slc.ca.gov/ceqa/

Geographic Location (Conduit Exit Points)

Montaña de Oro State Park
Latitude: 35° 18.408' N,
Longitude: 120° 53.000' W
NAD83 Datum

Manchester State Park
Latitude: 38°59.11950' N
Longitude: 124°09.25284' W
NAD83 Datum

Cover Photo: View to the north from Montaña de Oro Sandspit Parking Lot, San Luis Obispo County
(Photo courtesy of Padre Associates Inc.)

Prepared by

DUDEK

TABLE OF CONTENTS

EXECUTIVE SUMMARY **ES-1**

TABLE OF CONTENTS ..... **TOC-I**

LIST OF ABBREVIATIONS AND ACRONYMS ..... **ACR-I**

EXECUTIVE SUMMARY **ES-1**

1.0 PROJECT AND AGENCY INFORMATION **1-1**
1.1 PROJECT TITLE 1-1
1.2 LEAD AGENCY AND PROJECT SPONSOR 1-1
1.3 PROJECT LOCATION 1-1
1.4 PROJECT BACKGROUND AND OBJECTIVES 1-3
1.5 ORGANIZATION OF THE MITIGATED NEGATIVE DECLARATION 1-5
1.6 PUBLIC REVIEW AND COMMENT 1-6
1.7 APPROVALS AND REGULATORY REQUIREMENTS 1-6
1.7.1 California State Lands Commission 1-6
1.7.2 Other Agencies 1-7

2.0 PROJECT DESCRIPTION **2-1**
2.1 CABLE SPECIFICATIONS 2-2
2.2 PROJECT WORK AREAS 2-2
2.2.1 JUS S9 Montaña – San Luis Obispo County 2-5
2.2.2 JUS S9 Manchester and JUS S8 – Mendocino County 2-7
2.3 PRE-PROJECT ACTIVITIES 2-9
2.4 JUS S9 MONTAÑA ACTIVITIES 2-9
2.4.1 Open Water Cable Recovery 2-9
2.4.2 Onshore Cable Cutting 2-10
2.4.3 Dive Support Vessel Operations 2-10
2.5 MANCHESTER JUS S9 AND JUS S8 ACTIVITIES 2-13
2.5.1 Dive Support Vessel Operations 2-13
2.5.2 Open Water Cable Recovery 2-15
2.6 DEMOBILIZATION AND RECYCLING 2-15
2.7 PROJECT WORK SCHEDULE 2-16
2.8 PROJECT EQUIPMENT AND PERSONNEL 2-16
2.8.1 Work Vessels and Equipment 2-16
2.8.2 Project Personnel 2-20

3.0 ENVIRONMENTAL CHECKLIST AND ANALYSIS **3-1**
3.1 AESTHETICS 3-3
3.1.1 Environmental Setting 3-3
3.1.2 Regulatory Setting 3-6

3.1.3 Impact Analysis....3-6
3.1.4 Mitigation Summary....3-8
3.2 AGRICULTURE AND FOREST RESOURCES....3-9
3.2.1 Environmental Setting....3-10
3.2.2 Regulatory Setting....3-11
3.2.3 Impact Analysis....3-11
3.2.4 Mitigation Summary....3-12
3.3 AIR QUALITY....3-13
3.3.1 Environmental Setting....3-13
3.3.2 Regulatory Setting....3-19
3.3.3 Impact Analysis....3-22
3.3.4 Mitigation Summary....3-28
3.4 BIOLOGICAL RESOURCES....3-30
3.4.1 Environmental Setting....3-31
3.4.2 Regulatory Setting....3-42
3.4.3 Impact Analysis....3-42
3.4.4 Mitigation Summary....3-57
3.5 CULTURAL RESOURCES....3-58
3.5.1 Environmental Setting....3-58
3.5.2 Regulatory Setting....3-65
3.5.3 Impact Analysis....3-65
3.5.4 Mitigation Summary....3-67
3.6 CULTURAL RESOURCES – TRIBAL....3-68
3.6.1 Environmental Setting....3-69
3.6.2 Regulatory Setting....3-80
3.6.3 Impact Analysis....3-80
3.6.4 Mitigation Summary....3-83
3.7 ENERGY....3-84
3.7.1 Environmental Setting....3-84
3.7.2 Regulatory Setting....3-84
3.7.3 Impact Analysis....3-85
3.7.4 Mitigation Summary....3-86
3.8 GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES....3-87
3.8.1 Environmental Setting....3-88
3.8.2 Regulatory Setting....3-91
3.8.3 Impact Analysis....3-92
3.8.4 Mitigation Summary....3-95
3.9 GREENHOUSE GAS EMISSIONS....3-96
3.9.1 Environmental Setting....3-96
3.9.2 Regulatory Setting....3-98
3.9.3 Impact Analysis....3-99
3.9.4 Mitigation Summary....3-100

3.10 HAZARDS AND HAZARDOUS MATERIALS 3-101
3.10.1 Environmental Setting 3-102
3.10.2 Regulatory Setting 3-103
3.10.3 Impact Analysis 3-103
3.10.4 Mitigation Summary 3-106
3.11 HYDROLOGY AND WATER QUALITY 3-107
3.11.1 Environmental Setting 3-108
3.11.2 Regulatory Setting 3-110
3.11.3 Impact Analysis 3-111
3.11.4 Mitigation Summary 3-113
3.12 LAND USE AND PLANNING 3-114
3.12.1 Environmental Setting 3-114
3.12.2 Regulatory Setting 3-114
3.12.3 Impact Analysis 3-115
3.12.4 Mitigation Summary 3-115
3.13 MINERAL RESOURCES 3-116
3.13.1 Environmental Setting 3-116
3.13.2 Regulatory Setting 3-117
3.13.3 Impact Analysis 3-117
3.13.4 Mitigation Summary 3-117
3.14 NOISE 3-118
3.14.1 Environmental Setting 3-118
3.14.2 Regulatory Setting 3-120
3.14.3 Impact Analysis 3-120
3.14.4 Mitigation Summary 3-121
3.15 POPULATION AND HOUSING 3-122
3.15.1 Environmental Setting 3-122
3.15.2 Regulatory Setting 3-122
3.15.3 Impact Analysis 3-123
3.15.4 Mitigation Summary 3-123
3.16 PUBLIC SERVICES 3-124
3.16.1 Environmental Setting 3-124
3.16.2 Regulatory Setting 3-125
3.16.3 Impact Analysis 3-126
3.16.4 Mitigation Summary 3-127
3.17 RECREATION 3-128
3.17.1 Environmental Setting 3-128
3.17.2 Regulatory Setting 3-129
3.17.3 Impact Analysis 3-130
3.17.4 Mitigation Summary 3-132
3.18 TRANSPORTATION 3-133
3.18.1 Environmental Setting 3-133
3.18.2 Regulatory Setting 3-134

3.18.3 Impact Analysis....3-135
3.18.4 Mitigation Summary....3-137
3.19 UTILITIES AND SERVICE SYSTEMS....3-138
3.19.1 Environmental Setting....3-139
3.19.2 Regulatory Setting....3-139
3.19.3 Impact Analysis....3-140
3.19.4 Mitigation Summary....3-141
3.20 WILDFIRE....3-142
3.20.1 Environmental Setting....3-143
3.20.2 Regulatory Setting....3-143
3.20.3 Impact Analysis....3-143
3.20.4 Mitigation Summary....3-144
3.21 MANDATORY FINDINGS OF SIGNIFICANCE....3-145
3.21.1 Impact Analysis....3-146

4.0 OTHER CALIFORNIA STATE LANDS COMMISSION CONSIDERATIONS....1
4.1 CLIMATE CHANGE AND SEA LEVEL RISE....1
4.2 COMMERCIAL AND RECREATIONAL FISHING....2
4.3 ENVIRONMENTAL JUSTICE....3
4.3.1 U.S. Census Bureau Statistics....4
4.3.2 Population and Economic Characteristics....4
4.3.3 California Office of Environmental Health Hazard Assessment CalEnviroScreen Results....6
4.3.4 Conclusion....9
4.4 SIGNIFICANT LANDS INVENTORY....9

5.0 MITIGATED NEGATIVE DECLARATION PREPARATION SOURCES AND REFERENCES....5-1
5.1 CALIFORNIA STATE LANDS COMMISSION STAFF....5-1
5.2 SECTION AUTHORS AND REVIEWERS....5-1
5.3 REFERENCES CITED....5-2

APPENDICES

A Major Federal and State Laws, Regulations, And Policies Potentially Applicable to the AT&T Japan-U.S. Cable Network Decommissioning (JUS S8 and JUS S9 Cables) Project
B Local Laws, Regulations, And Policies Potentially Applicable to the AT&T Japan-U.S. Cable Network Decommissioning (JUS S8 and JUS S9 Cables) Project
C Air Quality and Greenhouse Gas Emissions Calculations
D-1 Marine Biological Resources Study
D-2 Post-Installation Burial Verification Survey Observations
D-3 Essential Fish Habitat Assessment
E Marine Archaeological and Cultural Resources Study
F Mitigation Monitoring Program

LIST OF TABLES

1-1 Anticipated Agencies with Review/Approval over Project Activities 1-8
2-1 Schedule of Project Events in State Waters by Location 2-16
2-2 Vessel Operations in State Waters Offshore Montaña de Oro and Manchester State Parks 2-17
2-3 Personnel Requirements 2-20
3.3-1 San Luis Obispo County Air Pollution Control District Air Quality CEQA Thresholds of Significance 3-21
3.3-2 Mendocino County Air Quality Management District Air Quality CEQA Thresholds of Significance 3-22
3.3-3 Estimated Maximum Daily Construction Criteria Air Pollutant Emissions – SLOAPCD 3-25
3.3-4 Estimated Quarterly Construction Criteria Air Pollutant Emissions – SLOAPCD 3-25
3.3-5 Estimated Maximum Daily Construction Criteria Air Pollutant Emissions – MCAQMD 3-26
3.4-1 Potential Occurrence of Special Status Species in the Project Area 3-39
3.5-1 Previous Studies Within the 0.5-Mile Search Radius of the Project 3-63
3.5-2 Previously Recorded Resources 3-64
3.6-1 California Central Coast Chronology 3-69
4-1 Environmental Justice Statistics – JUS S9 Montaña 4-6
4-2 Environmental Justice Statistics – JUS S9 Manchester and JUS S8 4-8

LIST OF FIGURES

ES-1 Project Vicinity……..ES-2
ES-2 Project Work Areas……..ES-3
1-1 Project Vicinity……1-2
2-1 Project Work Areas ……..……2-4
2-2 Example Vessel and Three-Point Anchor Spread……2-6
2-3 JUS S9 Montaña Onshore Work Area……2-8
2-4 Montaña de Oro JUS S9 Cable Work Areas with Wet Storage Options...2-12
2-5 Cable Crossing Area along Manchester S8 Alignment……2-14
2-6a Project Vessels……..2-18
2-6b Project Vessels……..2-19
3.1-1 Project Area Roadways……3-5
3.3-1 Sensitive Receptors……3-16
3.4-1 Marine Protected Areas and National Marine Sanctuaries……3-37

LIST OF ABBREVIATIONS AND ACRONYMS

A

AAQS	ambient air quality standards
AB	Assembly Bill
Applicant	AT&T Enterprises LLC

B

Basin Plan	Regional Water Quality Control Board Water Quality Control Plan for the Central Coastal Basin
BP	before present
BPTA	Baywood Park Training Area

C

CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
California Ocean Plan	Water Quality Control Plan, Ocean Waters of California
CAP	Clean Air Plan
CARB	California Air Resources Board
CCIC	Central California Information Center
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH_4	methane
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalents
CRV	cable recovery vessel
CSLC	California State Lands Commission

D

dB	decibel
dBA	A-weighted decibels
DESPM	Division of Environmental Science, Planning, and Management
DOC	California Department of Conservation
DPM	diesel particulate matter
DPS	distinct population segment
DSV	dive support vessel

E

EIR	environmental impact report
EPA	U.S. Environmental Protection Agency

G

GHG	greenhouse gas

H

HAPC	Habitat of Particular Concern
HP	horsepower

I

IPCC	Intergovernmental Panel on Climate Change
IS	Initial Study

L

LACM	Natural History Museum of Los Angeles County

M

MBRS	Marine Biological Resources Study
MCAQMD	Mendocino County Air Quality Management District
MJHMP	Multi-Jurisdictional Hazard Mitigation Plan
MM	Mitigation Measure
MMPA	Marine Mammal Protection Act
MND	Mitigated Negative Declaration
MPA	Marine Protected Area
MT	metric tons
MWM	marine wildlife monitor

N

NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCAB	North Coast Air Basin
nm	nautical mile
NMFS	National Marine Fisheries Service
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NRHP	National Register of Historic Places
NWIC	Northwest Information Center

O

O_3	Ozone

P

$PM_{2.5}$	fine particulate matter (2.5 micrometers or less in diameter)
PM_{10}	coarse particulate matter (10 micrometers or less in diameter)
ppm	parts per million

R

ROG	reactive organic gas
ROV	remotely operated vehicle
RTP/ATP	Regional Transportation Plan/Active Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy

S

SB	Senate Bill
SCCAB	South Central Coast Air Basin
SLOAPCD	San Luis Obispo County Air Pollution Control District
SLOCOG	San Luis Obispo Council of Governments
SO_2	sulfur dioxide
SOPEP	Shipboard Oil Pollution Emergency Plan
SO_X	Sulfur Oxides
SWRCB	State Water Resources Control Board

T

TAC	toxic air contaminant

U

USACE	U.S. Army Corps of Engineers
USCG	U.S. Coast Guard
USFWS	U.S. Fish and Wildlife Service

V

VMT	vehicle miles traveled

EXECUTIVE SUMMARY

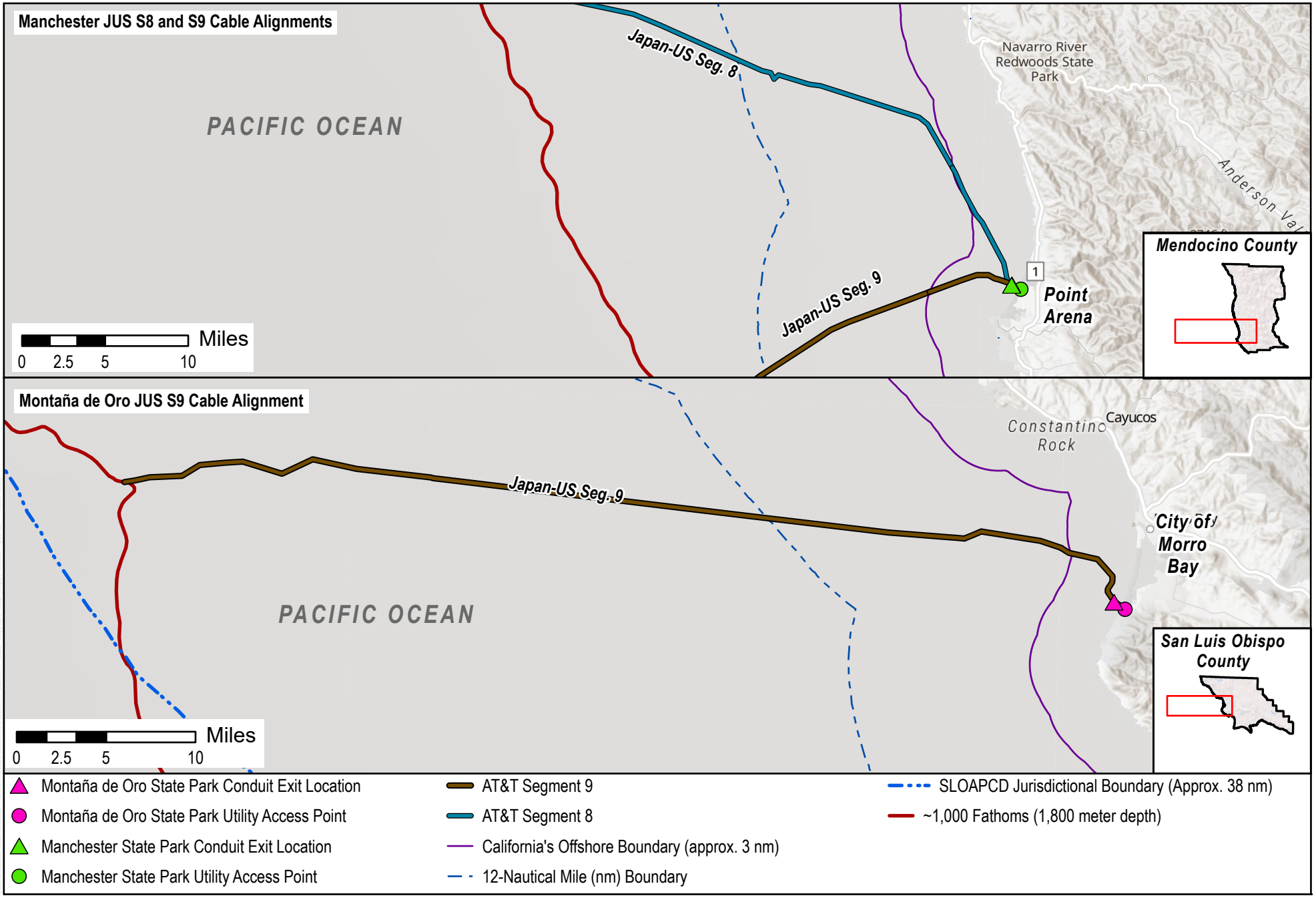
This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared by the California State Lands Commission (CSLC), as lead agency under the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.), to analyze and disclose the environmental effects associated with the proposed AT&T Japan–U.S. Cable Network Decommissioning (JUS S8 and JUS S9 Cables) (Project). The Project would authorize AT&T Enterprises LLC (AT&T) (Applicant) to decommission Segments S8 and S9 (JUS S8 and S9) of the Japan–U.S. Cable Network's submarine fiber optic telecommunication cable system.

The CSLC prepared an MND because it determined that, although the IS identifies potentially significant impacts related to the Project, mitigation measures incorporated into the Project proposal and agreed to by the Applicant will avoid or mitigate those impacts to a point where no significant impacts occur.

PROPOSED PROJECT

AT&T is proposing to decommission JUS S8 and S9 of the Japan–U.S. Cable Network's submarine fiber optic telecommunication cable system. While AT&T's overall project would take place across the Pacific Ocean between Japan and California, including both federal and international waters, the limit of California's jurisdiction is out to the state's offshore boundary that is located approximately 3 nautical miles offshore Mendocino and San Luis Obispo Counties (Figure ES-1). As a result, the cable decommissioning occurring in both international and federal waters (between California's offshore boundary [3 nm] and the 1,000-fathom contour), although part of AT&T's overall project, is outside the scope of all impacts analyzed in this IS/MND except for Air Quality (*Section 3.3*) and Greenhouse Gas Emissions (*Section 3.9*). For these two resource areas, the IS/MND analyzes impacts within the San Luis Obispo County Air Pollution Control District's asserted CEQA authority to regulate air quality emissions out to California's Coastal Waters boundary (Cal. Code Regs., tit. 17, § 70500), which extends approximately 38 nautical miles offshore from Morro Bay.

The Project work areas (Figure ES-2) are primarily located onshore and offshore San Luis Obispo County and offshore Mendocino County. JUS S9 Montaña work activities would include open water cable recovery, onshore cable cutting, and dive support vessel (DSV) operations for cable excavation and cutting and conduit cable removal. JUS S9 Manchester and JUS S8 work activities would include DSV operations for cable excavation and cutting as well as open water cable recovery.



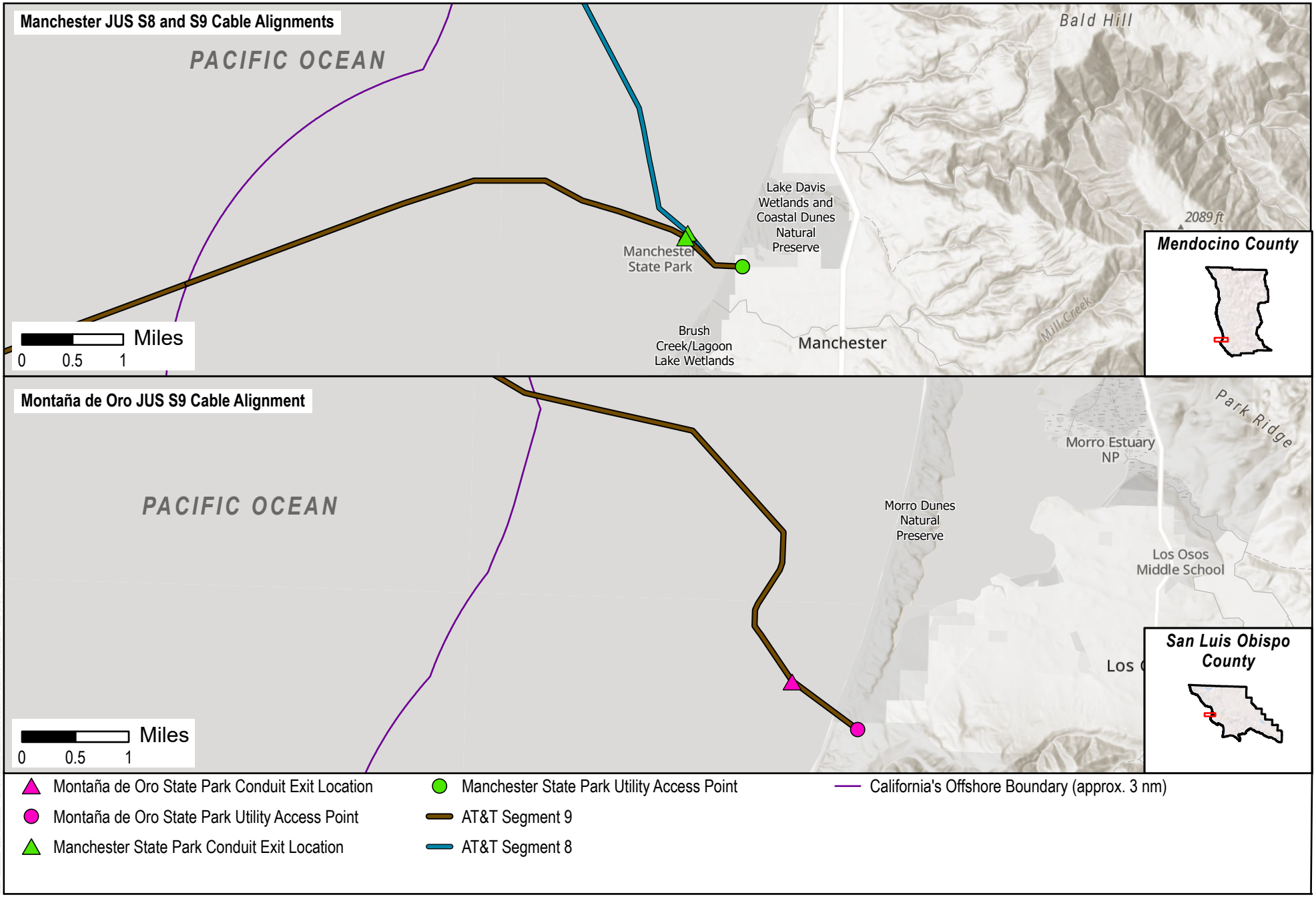
SOURCE: Padre Associates, Inc. 2024, ESRI Basemap (accessed 2025)

FIGURE ES-1

Project Vicinity

AT&T Japan- U.S. Cable Network Decommissioning

DUDEK



SOURCE: Padre Associates, Inc. 2024, ESRI Basemap (accessed 2025)

FIGURE ES-2

Project Work Areas

AT&T Japan- U.S. Cable Network Decommissioning

DUDEK

ENVIRONMENTAL IMPACTS AND PROPOSED MITIGATION MEASURES

The resources noted below have the potential to be affected by this Project and have at least one impact that would be a "potentially significant impact." The Applicant has agreed to the implementation of mitigation measures that would reduce the potential impacts to "less than significant with mitigation," as detailed in Chapter 3, Environmental Checklist and Analysis, of this MND. Appendix F, Mitigation Monitoring Program, outlines the proposed mitigation measures designed to reduce or avoid potentially significant impacts. With implementation of the proposed mitigation measures, all Project-related impacts would be reduced to less than significant.

Environmental Issues with Potentially Significant Impacts:

- Air Quality
- Biological Resources
- Cultural Resources
- Cultural Resources – Tribal
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Recreation
- Transportation
- Mandatory Findings of Significance

Summary of Proposed Project Mitigation Measures (MMs):

Air Quality

- MM AQ-1a: Reactive Organic Gases (ROG) + Nitrogen Oxides (NO_X) and Diesel Particulate Matter (DPM) Emission Offset Credits - San Luis Obispo Air Pollution Control District (SLOAPCD)
- MM AQ-1b: Reactive Organic Gases (ROG) and Nitrogen Oxides (NO_X) Emission Offset Credits – Mendocino County Air Quality Management District (MCAQMD)

Biological Resources

- MM BIO-1: Pre-Activity Worker Environmental Training
- MM BIO-2: National Marine Fisheries Service (NMFS)–Approved Wildlife Monitor
- MM BIO-3: Modify Vessel Operations
- MM BIO-4: Avoid Anchor Impacts to Marine Wildlife
- MM BIO-5: Vessel Lighting
- MM BIO-6: Marine Safety and Anchoring Plan
- MM HAZ-1: Vessel Waste Management Plan
- MM HAZ-2: Shipboard Oil Pollution Emergency Plan

Cultural Resources

- MM CUL-1: Prepare and Implement an Avoidance Plan for Marine Archaeological Resources
- MM CUL-2: Unanticipated Discovery of Human Remains

Cultural Resources – Tribal

- MM TCR-1: Tribal Cultural Awareness Training

Hazards and Hazardous Materials

- MM HAZ-1: Vessel Waste Management Plan
- MM HAZ-2: Shipboard Oil Pollution Emergency Plan

Hydrology and Water Quality

- MM HAZ-1: Vessel Waste Management Plan
- MM HAZ-2: Shipboard Oil Pollution Emergency Plan

Recreation

- MM REC-1: Advanced Local Notice to Mariners
- MM REC-2: Advanced Notice to Ocean Users

Transportation

- MM REC-1: Advanced Local Notice to Mariners

1.0 PROJECT AND AGENCY INFORMATION

1.1 PROJECT TITLE

AT&T Japan–U.S. Cable Network Decommissioning (JUS S8 and JUS S9 Cables) Project (Project)

1.2 LEAD AGENCY AND PROJECT SPONSOR

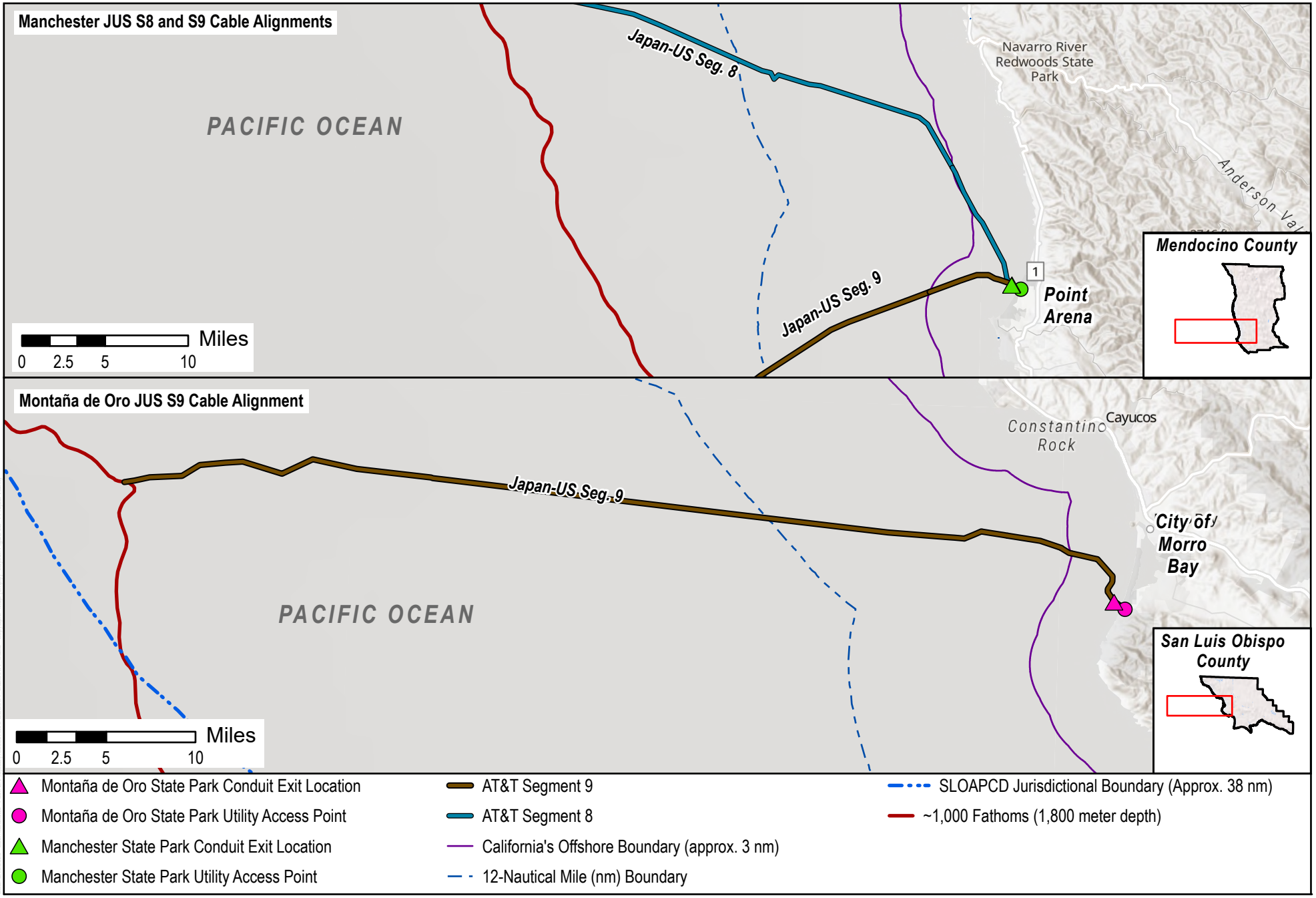
Lead Agency
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825
Contact: Robin Tuohy, Environmental Scientist
Division of Environmental Science, Planning, and Management
Robin.Tuohy@slc.ca.gov
916.574.0900

Applicant
AT&T Enterprises LLC
c/o Paul Hastings LLP
101 California Street, 48th Floor
San Francisco, CA 94111
Contact: Lucas Grunbaum
lucasgrunbaum@paulhastings.com
415.856.7000

1.3 PROJECT LOCATION

The Project areas are primarily located offshore and nearshore Mendocino and San Luis Obispo Counties (Figure 1-1). The full JUS S9 cable segment runs offshore of the California coast between two shore landings in Montaña de Oro State Park, San Luis Obispo County and Manchester State Park, Mendocino County, and the full JUS S8 cable segment runs between Manchester State Park and Japan. The Project also includes one onshore work area within Montaña de Oro State Park.

Refer to Chapter 2, Project Description, for further details on the Project location.



SOURCE: Padre Associates, Inc. 2024, ESRI Basemap (accessed 2025)

FIGURE 1-1

Project Vicinity

AT&T Japan- U.S. Cable Network Decommissioning

DUDEK

1.4 PROJECT BACKGROUND AND OBJECTIVES

AT&T Enterprises LLC (AT&T) installed the Japan–U.S. Cable Network from 2000 through 2001 and operated fiber optic cables JUS S8 and JUS S9 until the cables were taken out of service in June 2023. The cable system was originally installed in accordance with the Initial Study/Mitigated Negative Declaration (IS/MND) for the Japan–U.S. Cable System, which was prepared by the California State Lands Commission (CSLC) and adopted in 2000 (State Clearinghouse No. 2000031062).

Prior to installation, the CSLC issued two leases within State waters for the Japan–U.S. Cable Network: Lease PRC 8203.1 (Manchester State Park, Mendocino County), and Lease PRC 8204.1 (Morro Bay, San Luis Obispo County). Leases PRC 8203.1 and PRC 8204.1 were initially authorized on June 27, 2000, for a period of 10 years beginning July 1, 2000. On October 29, 2010, both leases were reauthorized for an additional 15-year term through June 30, 2025, when the leases then became month-to-month tenancies. Lease PRC 8203.1 is for the use and maintenance of five 5-inch-diameter steel conduits and two fiber optic cables (JUS S8 and JUS S9) within two of the five steel conduits. Lease PRC 8204.1 is for the use and maintenance of one fiber optic cable, identified as the south end of JUS S9. Lease PRC 8142.1 is for the operation and maintenance of one 6-inch diameter steel conduit. The conduit is occupied by the fiber optic cable authorized under Lease PRC 8204.1.

In addition to CSLC lease requirements, other resource agencies and stakeholders set forth conditions regarding decommissioning once the JUS S8 and JUS S9 cables were out of service. In particular, Condition 7 of the Coastal Development Permit (CDP E-00-004) issued by the California Coastal Commission requires the following:

> *Within 90 days of taking either the cable out of service or after the expiration or sooner termination of the applicant's State Lands Commission lease(s) or permits(s), the applicant shall apply for an amendment to this permit to remove the cables from the seafloor. Cable removal shall occur from the mean high tide line to the seaward limit of the territorial waters of the State of California.*

Additionally, in 1999, during the early installation of other fiber optic cables (unrelated to this Project), AT&T entered into agreements with the licensed fishermen along the California coast. Those agreements required that new cables be buried within trawling grounds shallower than 1,000 fathoms (1 fathom

equals approximately 1.8 meters).[1] As such, AT&T agreed to remove out-of-service fiber optic cables out to the 1,000-fathom depth to avoid potential interference with commercial fishing activities in the areas where cables were previously buried.

Therefore, AT&T's overall work plan objective is the removal, of the JUS S8 and JUS S9 cable segments from their exit points on the seafloor and out to the 1,000-fathom depth, which involves the removal of approximately 39.9 miles of the JUS S8 cable totaling 236.4 tons, and 79.1 miles of the JUS S9 cable totaling 460 tons. The conduits that housed the JUS S8 and JUS S9 cable segments will remain in place and under lease. Once recovered, the cables will be recycled at a facility in South Africa.

However, California's offshore boundary is located approximately 3 nautical miles (nm) offshore Mendocino and San Luis Obispo Counties. As a result, the cable decommissioning occurring in both international and federal waters (between California's offshore boundary (3 nm) and the 1,000-fathom contour), although part of AT&T's overall project, is outside the scope of all impacts analyzed in this IS/MND except for Air Quality (*Section 3.3*) and Greenhouse Gas Emissions (*Section 3.9*). For these two resource areas, the IS/MND analyzes impacts within the asserted California Environmental Quality Act (CEQA) authority of the San Luis Obispo County Air Pollution Control District (SLOAPCD) to regulate air quality emissions out to California's Coastal Waters boundary (Cal. Code Regs., tit. 17, § 70500), which extends approximately 38 nm offshore from Morro Bay.

The Project objective within California's jurisdiction is to remove approximately 7.9 miles of cable for JUS S8 and approximately 9.6 miles for JUS S9. Upon completion of the Project, Leases PRC 8203.1 and PRC 8204.1 would either be amended to reduce the lease areas of the remaining conduits, or the leases would be terminated, and new leases would be issued for the remaining conduits.

---

[1] According to *AT&T Japan–U.S. Cable Network Decommissioning (Cable Segments 8 and 9) Environmental Analysis and Technical Studies. Offshore Montaña de Oro (San Luis Obispo County) and Manchester (Mendocino County), California* by Padre Associates Inc. (December 2024) submitted to the California State Lands Commission with the lease application.

1.5 ORGANIZATION OF THE MITIGATED NEGATIVE DECLARATION

This IS/MND is intended to provide the CSLC, as lead agency under CEQA (Pub. Resources Code, § 21000, et seq.), and other responsible agencies with the information required to exercise their discretionary responsibilities for the proposed Project. The MND is organized as follows:

Chapter 1 presents the Project background and Project location, agency and Applicant information, Project objectives, anticipated agency approvals, and a summary of the public review and comment process.

Chapter 2 describes the proposed Project—its location, equipment, and construction activities—and provides an overview of the Project's operations and schedule.

Chapter 3 presents the IS, which includes the environmental setting, identification and analysis of potential impacts, and discussion of Project changes and other measures that, if incorporated into the Project, would mitigate or avoid those impacts, such that no significant effect on the environment would occur. The CSLC prepared this IS pursuant to State CEQA Guidelines section 15063.[2]

Chapter 4 discusses other CSLC considerations relevant to the Project, such as climate change and sea level rise, commercial fishing, and environmental justice that are in addition to the environmental review required pursuant to CEQA.

Chapter 5 presents information on report preparation and references.

Appendices include the Mitigation Monitoring Program, specifications, technical data, and other information supporting the analysis presented in this IS/MND:

Appendix A: Major Federal and State Laws, Regulations, and Policies Potentially Applicable to the AT&T Japan–U.S. Cable Network Decommissioning (JUS S8 and JUS S9 Cables) Project

Appendix B**:** Local Laws, Regulations, and Policies Potentially Applicable to the AT&T Japan–U.S. Cable Network Decommissioning (JUS S8 and JUS S9 Cables) Project

---

[2] The state CEQA Guidelines are found in California Code of Regulations, title 14, section 15000 et seq.

Appendix C: Air Quality and Greenhouse Gas Emissions Calculations

Appendix D-1: Marine Biological Resources Study

Appendix D-2: Post-Installation Burial Verification Survey Observations

Appendix D-3: Essential Fish Habitat Assessment

Appendix E: Marine Archaeological and Cultural Resources Study

Appendix F: Mitigation Monitoring Program

1.6 PUBLIC REVIEW AND COMMENT

Pursuant to CEQA Guidelines sections 15072 and 15073, a lead agency must issue a proposed MND for a minimum 30-day public review period. Agencies and the public will have the opportunity to review and comment on the document. Responses to written comments received by CSLC during the 30-day public review period will be incorporated into the MND, if necessary, and provided in CSLC's staff report. In accordance with CEQA Guidelines section 15074, subdivision (b), CSLC will review and consider the MND, together with any comments received during the public review process, prior to taking action on the MND and Project at a noticed public hearing.

1.7 APPROVALS AND REGULATORY REQUIREMENTS

1.7.1 California State Lands Commission

All tidelands and submerged lands, granted or ungranted, as well as navigable lakes and waterways, are subject to the protections of the common law Public Trust. The State of California acquired sovereign ownership of all tidelands and submerged lands and beds of navigable lakes and waterways upon its admission to the United States in 1850. The State holds these lands for the benefit of all people of the State for statewide Public Trust purposes, which include but are not limited to, waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation, and open space.

On tidal waterways, the State's sovereign fee ownership extends landward to the ordinary high-water mark, which is generally reflected by the mean high-tide line, except for areas of fill or artificial accretion. For this Project, the State's sovereign fee ownership extends from the ordinary high-water mark to 3 nm

offshore[3] from the coast, as seen in Figure 1-1. The CSLC's authority is set forth in Division 6 of the Public Resources Code and California Code of Regulations, title 2, sections 1900–2970. The CSLC has authority to issue leases or permits for the use of sovereign land held in the Public Trust, including all ungranted tidelands, submerged lands, and the beds of navigable lakes and waterways, as well as certain residual and review authority for tidelands and submerged lands legislatively granted in trust to local jurisdictions (Pub. Resources Code, §§ 6009, subd. (c); 6009.1; 6301; 6306). The CSLC must comply with CEQA when it undertakes an activity defined by CEQA as a "project" that must receive discretionary approval (i.e., the CSLC has the authority to approve or deny the requested lease, permit, or other approval) and that may cause either a direct physical change or a reasonably foreseeable indirect change in the environment. CEQA requires the CSLC to identify the significant environmental impacts of its actions and to avoid or mitigate those impacts, if feasible.

In November 2024, AT&T (Applicant) submitted applications for lease amendments to CSLC to use the area under CSLC's jurisdiction to decommission JUS S8 and JUS S9 through removal of cables and associated restoration of the lease premises (See *Section 1.4* for lease details).

1.7.2 Other Agencies

In addition to the CSLC, the Project, including activities in federal waters, is subject to the review and approval of other federal, State, and local entities with statutory or regulatory jurisdiction over various aspects of the Project (see Table 1-1). The Project is exempt from approval by the California Department of Fish and Wildlife (CDFW) because the cables are considered a pre-existing artificial structure and removal is an allowed activity exempt from permitting or approval because the infrastructure pre-dates the Marine Protected Area (MPA).[4] Additionally, AT&T has an existing agreement and grant of easement in

---

[3] In some locations, including the vicinity of Morro Bay, California's jurisdiction extends somewhat further than 3 nautical miles, because the exact location of the federal-state offshore boundary is defined in a Supreme Court supplemental decree (*United States v. California* [2014] 574 U.S. 105, 257).

[4] See California Code of Regulations., title 14, section 632, subdivision (a)(1)(A)(1).

place (1995) with the California Department of Parks and Recreation (State Parks), which allows AT&T to construct, maintain, inspect, repair, replace, and remove the underground fiber optic cable communication system in Montaña de Oro State Park.

Table 1-1. Anticipated Agencies with Review/Approval over Project Activities

Permitting Agency	Anticipated Approvals/Regulatory Requirements
State	
California State Lands Commission	Lease Amendments and CEQA Lead Agency
California Coastal Commission	Amendment to Coastal Development Permit No. E-00-004 Federal Consistency Determination for all Federal approvals and permits; Section 307(c)(3)(A) of the Coastal Zone Management Act
California Department of Fish and Wildlife	California Endangered Species Act
State Water Resources Control Board	Clean Water Act Section 401 Water Quality Certification
California State Office of Historic Preservation and the State Historical Preservation Office	Consultation under Section 106 of National Historic Preservation Act
Federal	
U.S. Army Corps of Engineers	Clean Water Act Section 404 (under Nationwide Permit No. 57)
U.S. Fish and Wildlife Service	Section 7 Consultation (Federal Endangered Species Act)
National Marine Fisheries Service	Section 7 Consultation (Federal Endangered Species Act), compliance with Marine Mammal Protection Act, and Essential Fish Habitat Assessment (Magnuson-Steven Fishery Conservation and Management Act)

Table 1-1. Anticipated Agencies with Review/Approval over Project Activities

Permitting Agency	Anticipated Approvals/Regulatory Requirements
Office of National Marine Sanctuaries (ONMS)	ONMS Permit/Authorization from ONMS to work in National Marine Sanctuary
U.S. Coast Guard	Notice to Mariners

2.0 PROJECT DESCRIPTION

AT&T proposes to decommission portions of Segments S8 and S9 (JUS S8 and JUS S9) of the Japan–U.S. Cable Network's submarine fiber optic cable system lying eastward of the 1,000-fathom contour (Figure 1-1). Approximately 3,503 kilometers of the cable network has been recovered westward of the 1,000-fathom contour, with the recovery having started in Japan and moving east. No recovery operations have occurred yet in state or federal waters or eastward of the 1,000-fathom contour. The Project involves removal of the JUS S8 and JUS S9 cables between points offshore of Montaña de Oro and Manchester State Parks and the 1,000-fathom contour (see *Section 1.4*).

More than 80 percent of the cables (out to the 1,000-fathom contour) are buried at least 1.5 feet deep and have a maximum depth of burial of 6.5 feet along JUS S9 offshore Montaña de Oro State Park. Several sections of that cable are also intermittently exposed along the seafloor, but a very low percentage of the overall cables were exposed (JUS S8 at 0.03 percent and JUS S9 at 0.12 to 1.3 percent) at the time of AT&T's 2015 burial verification survey (Global Marine Systems 2015a, 2015b, 2015c).

The overall Project's decommissioning activities would begin with the JUS S9 cable segment that comes ashore in Montaña de Oro State Park (JUS S9 Montaña), in offshore waters approximately 58 miles to the west of San Luis Obispo County in the Pacific Ocean (Figure 1-1) and at the 1,000-fathom contour (depths of approximately 1,800 meters), and work east. Cable removal activities in international and federal waters would require a remotely operated vehicle (ROV) vessel to support locating, cutting, and securing the cable onto the cable recovery vessel (CRV) as well as securing the cable segment that would remain to the seafloor (to prevent entanglement with vessels or marine life) west of the 1,000-fathom contour. The CRV would pull the cable, vertically and in alignment with its position on the seafloor, into one of the internal cable tanks stowed onboard. At approximately 9.0 miles offshore, a section of the JUS S9 Montaña cable runs underneath the in-service Bifrost and Global West cables (not a part of the Project). To prevent interference with the crossed cables, international cable regulations prohibit the removal of this segment. Instead, cuts would be made at two locations west and east of the cable crossing area and the abandoned cable would be secured with a clump weight and sunk back to the seafloor. Then the CRV would transit to the conduit exit point

offshore Montaña de Oro State Park to continue cable recovery and removal within California jurisdiction, before finally completing activities in federal waters.

Once JUS S9 Montaña decommissioning activities are complete, the JUS S9 cable segment that comes ashore in Manchester State Park (JUS S9 Manchester) would be decommissioned and removed by the CRV using the same methodology as JUS S9 Montaña and beginning at its exit point from the conduit offshore Manchester State Park. When the CRV arrives at the 1,000 fathoms depth offshore, the cable would be cut on the CRV deck and the remaining cable end would be weighted and returned to the seabed. The CRV would then transit to the JUS S8 cable segment where it exits its conduit, offshore Manchester State Park, and would repeat the same process as for JUS S9 Manchester. Neither the JUS S9 Manchester nor the JUS S8 cable segments have any cable crossing areas of concern.

Starting with *Section 2.1* of this IS/MND, the Project Description details the activities required for the removal of the JUS S8 and JUS S9 fiber optic cables within California's jurisdiction (i.e., approximately 3 nm offshore Mendocino and San Luis Obispo Counties and onshore at Montaña de Oro State Park in San Luis Obispo County).

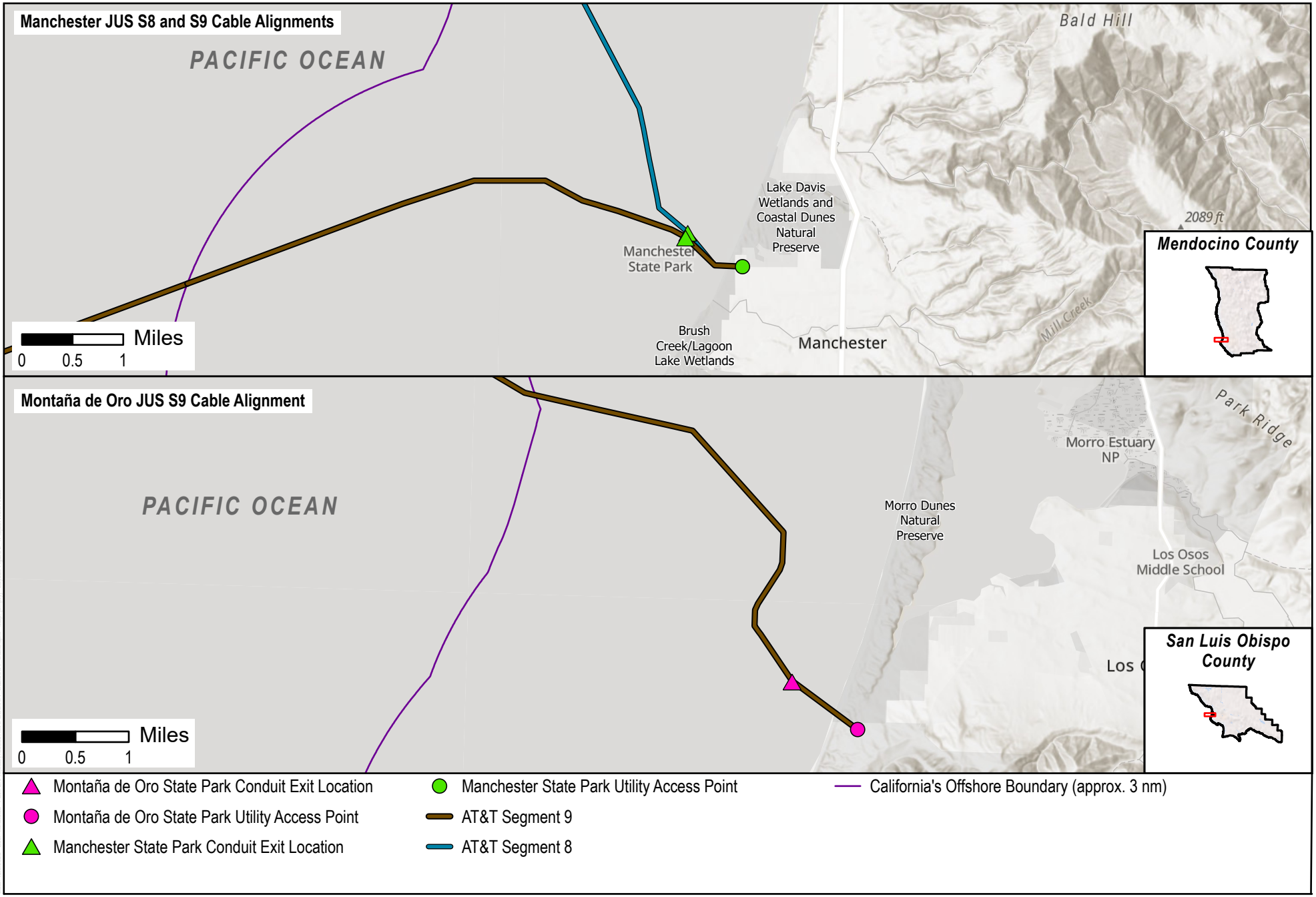
2.1 CABLE SPECIFICATIONS

The JUS S8 and JUS S9 cables are 2-inch-thick cables that contain a core of optical fibers encased in rings of steel wires, copper sheathing, polyethylene insulation, and nylon yarn coated in asphalt for waterproofing. The cables are no longer in operation, and no associated electric field is being generated by the inner conductor. Each cable has an associated steel conduit where the cable enters the seafloor and travels under the surf zone to connect to the onshore telecommunication networks at the onshore landing or utility access point. The conduits are buried to a maximum depth of 70 feet below the seafloor and onshore.

2.2 PROJECT WORK AREAS

Cable removal activities would take place in offshore and onshore work areas. Project activities would start in the offshore work area for each cable alignment (the narrow corridor on the seafloor traversed by the fiber optic cable(s)) which includes: (1) JUS S9 Montaña near San Luis Obispo County, and (2) JUS S9 Manchester and JUS S8 near Mendocino County (Figure 2-1). The onshore work

area would be located near the coast in San Luis Obispo County but would not require marine transport or equipment. Offshore work areas would be located in both shallow, coastal areas and deeper, open water areas that are outside of California's continental shelf. The shallow, coastal offshore work areas would include work activities conducted by commercial divers at water depths between approximately 33 to 50 feet. Cable removal work occurring in depths greater than 98 feet deep would require the use of specific marine vessels designed for work at these greater depths.



SOURCE: Padre Associates, Inc. 2024, ESRI Basemap (accessed 2025)

DUDEK

FIGURE 2-1

Project Work Areas

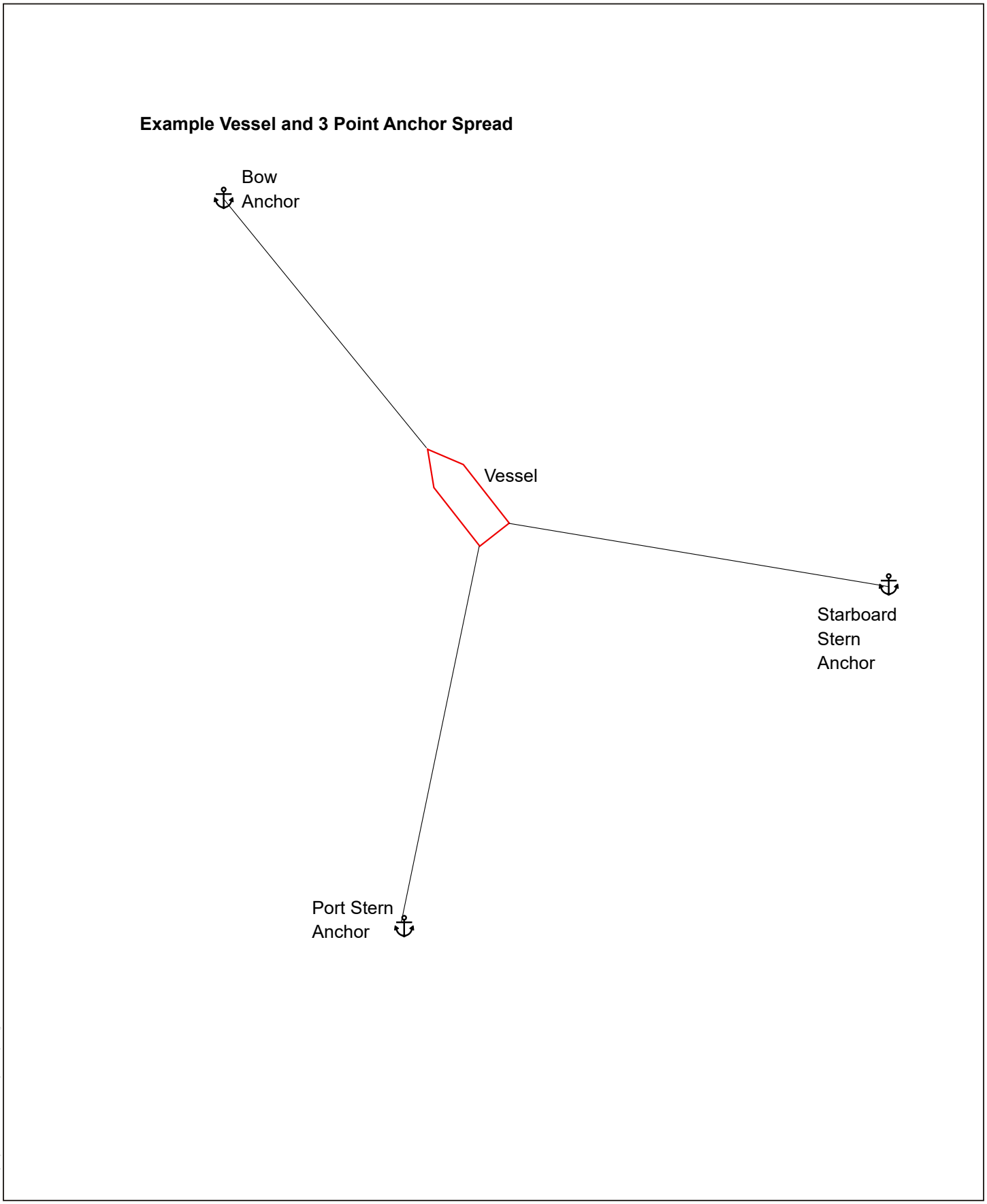
AT&T Japan- U.S. Cable Network Decommissioning

2.2.1 JUS S9 Montaña – San Luis Obispo County

Project activities for JUS S9 Montaña would occur within and offshore San Luis Obispo County (Figure 2-1). The offshore work area would include both shallow, coastal waters and open water. From the conduit exit point, the cable alignment has a northwest bearing while within California's offshore boundary. Offshore work activities would occur within a 656-foot buffered work area corridor centered on the JUS S9 Montaña cable alignment, with diver-assisted cable removal activities occurring around the conduit exit point in water depths of approximately 33 feet and a distance of 2,540 feet offshore. This work area corridor includes open water areas for operations and is larger than the expected area of seafloor disturbance.

Marine vessels involved in JUS S9 Montaña activities would include a CRV, dive support vessel (DSV), a tugboat, and other support vessels required to assist the CRV. Prior to Project activities, a survey vessel would complete geophysical surveys along the JUS S9 Montaña cable route that is 0.5 to 2 miles from the shore. The DSV, with the complete dive spread (dive supplies, equipment, and personnel), and the CRV would mobilize from Port Hueneme to the JUS S9 Montaña offshore work area. Mobilization plans may not be available for all Project vessels (i.e., tugboat and other support vessels) at the time of IS/MND publication and would be too speculative for further consideration. For a more detailed discussion of Project vessels, see *Section 2.8.1*.

Anchoring may be required for support vessels during cable removal, if ocean conditions are not suitable for continued live boating (e.g., periods of inclement weather during certain activities when vessels need to hold station). For DSV operations, the DSV and tugboat would be on anchor while conducting Project activities around the conduit exit location. Three anchors would be used in a three-point spread to remain in position, with an estimated 24 total anchor locations (Figure 2-2).



SOURCE: Padre Associates, Inc. 2025

FIGURE 2-2

Example Vessel and Three-Point Anchor Spread

AT&T Japan- U.S. Cable Network Decommissioning

DUDEK

The onshore work area would be in the Sandspit parking lot of Montaña de Oro State Park (Figure 2-3). The utility access point (manhole) is located inside the parking lot, which contains 50 parking spaces, 6 of which would be used to stage Project-related vehicles and equipment. The Sandspit parking lot would be accessed via Sand Spit Road and Pecho Valley Road, which are existing, paved roads within Montaña de Oro State Park. All onshore work activities would be located within the utility access point and the six surrounding parking spaces. The work area would be blocked off using fencing or cones and signage would be displayed during work hours.

2.2.2 JUS S9 Manchester and JUS S8 – Mendocino County

Project activities for JUS S9 Manchester and JUS S8 would occur in both shallow, coastal waters and open water offshore of Mendocino County; no onshore work is proposed as part of the JUS S9 Manchester and JUS S8 Project activities (Figure 2-1). From each respective conduit exit point, JUS S8 has a northwest bearing and JUS S9 Manchester has a west and southwest bearing. Diver-assisted cable removal activities would occur in shallow water depths of approximately 33 to 36 feet and a distance of 2,327 feet offshore for JUS S9 Manchester and 2,364 for JUS S8. All offshore work activities would occur within a 656-foot buffered work area centered on the JUS S9 Manchester and JUS S8 cable alignments. This work area corridor includes open water areas for operations and is larger than the expected seafloor disturbance footprint.

Marine vessels involved in JUS S9 Manchester and JUS S8 activities would include a CRV, a DSV, and other support vessels required to assist the CRV. The CRV, DSV, and other support vessels would transit to the JUS S9 Manchester and JUS S8 offshore work area after completing JUS S9 Montaña Project activities. For a more detailed discussion of Project vessels, see *Section 2.8.1*. Marine vessel anchoring would occur in the same manner as anchoring for the JUS S9 Montaña activities discussed in *Section 2.2.1*. For the JUS S9 Manchester and JUS S8 activities, there would be an estimated 15 total anchor locations.

Top Image: Onshore Work Area Looking Northeast

Bottom Image: Onshore Work Area Looking Northwest

SOURCE: Padre Associates, Inc. 2025

FIGURE 2-3

JUS S9 Montaña Onshore Work Area

AT&T Japan- U.S. Cable Network Decommissioning

DUDEK

2.3 PRE-PROJECT ACTIVITIES

All Alignments

Prior to offshore work activities, onshore technicians would tone the cables by introducing an inaudible tone through the cables that would carry through the copper conductor and assist in finding the buried cables offshore. Divers would use a handheld cable tracker to detect the tone, locate the cables, and distinguish the JUS S9 Manchester and JUS S8 cables from other non-project cables. The cable toning for JUS S9 Montaña would be conducted from the onshore work area. The cable toning for JUS S9 Manchester and JUS S8 would be conducted from the same utility access point within AT&T's cable station in Manchester State Park.

JUS S9 Montaña

In addition to the activities described above, geophysical surveys would be completed along the JUS S9 Montaña cable route at a distance approximately 0.5 to 2 miles from shore.

2.4 JUS S9 MONTAÑA ACTIVITIES

2.4.1 Open Water Cable Recovery

When the CRV arrives from federal waters into state waters, it would continue transiting east to the JUS S9 Montaña conduit exit location, approximately 3,200 feet offshore of Montaña de Oro State Park (35° 18.408' N, 120° 53.000' W). A support vessel would be mobilized from Port Hueneme to provide positioning assistance to the CRV and would be positioned near the conduit exit. While the CRV is in transit, Project activities led by the DSV would occur around the conduit exit location to prepare JUS S9 Montaña for the CRV (see *Section 2.4.3* for more information). Once the DSV activities are complete, the CRV would then move into position seaward of the cable's conduit exit location.

Once secured to the CRV, the cable would be routed over the bow roller (equipment used to guide the cable over the bow) to the traction winch and cable tension track and then into one of the internal cable tanks. The cable would be pulled vertically, in alignment with its position on the seafloor, while working from the seaward (west) side of the CRV. The CRV would then transit west, recovering the JUS S9 Montaña cable through and then beyond state

waters. Recovering the cable vertically is expected to temporarily disturb a strip of seafloor about 6 inches wide and adjacent seafloor along the length of the cable corridor. The total temporary seafloor disturbance for the JUS S9 Montaña removal in state waters would be approximately 0.3 acre.

Once activities in federal waters are complete, the CRV would transit east back towards the JUS S9 Montaña conduit exit location to recover the conduit cable segment (see *Section 2.4.3.2*).

2.4.2 Onshore Cable Cutting

A six-person crew would arrive at the work site using a utility truck and pickup truck. The crew would enter the utility access point in the parking lot, unclamp the cable, and cut it using a circular saw. The crew would use a rope reel and trailer to attach rope to the cable end and pay out the rope in coordination with the DSV and tugboat (see *Section 2.4.3.2*) as the conduit cable segment is pulled offshore. The crew would close the utility access point after onshore work is completed. Access to the parking lot, restrooms, and the beach would be maintained during work activities.

2.4.3 Dive Support Vessel Operations

2.4.3.1 Cable Excavation and Cutting

A commercial dive operation on the M/V *Surveyor*, or similar, would be mobilized from Morro Bay Harbor, San Luis Obispo County as the DSV to complete diver-assisted Project activities offshore of Montaña de Oro State Park. A team of commercial divers would locate the cable near its exit from the conduit and expose the cable using underwater excavation equipment such as hand jets. The cable would be exposed for approximately 98.4 feet, starting from the end of the conduit, and the excavation would be approximately 16.4 feet wide with a disturbance of 0.04 acre or 1,615 square feet. The uncovered cable would then be cut by divers with hand tools. The divers would rig the seaward cable end with recovery rigging and buoys and would float the cable towards the surface for recovery by the CRV. The diver-assisted recovery rigging would consist of polyform buoys connected to a recovery line and various shackles rigged to a soft sling and cable gripper secured on to the cable end.

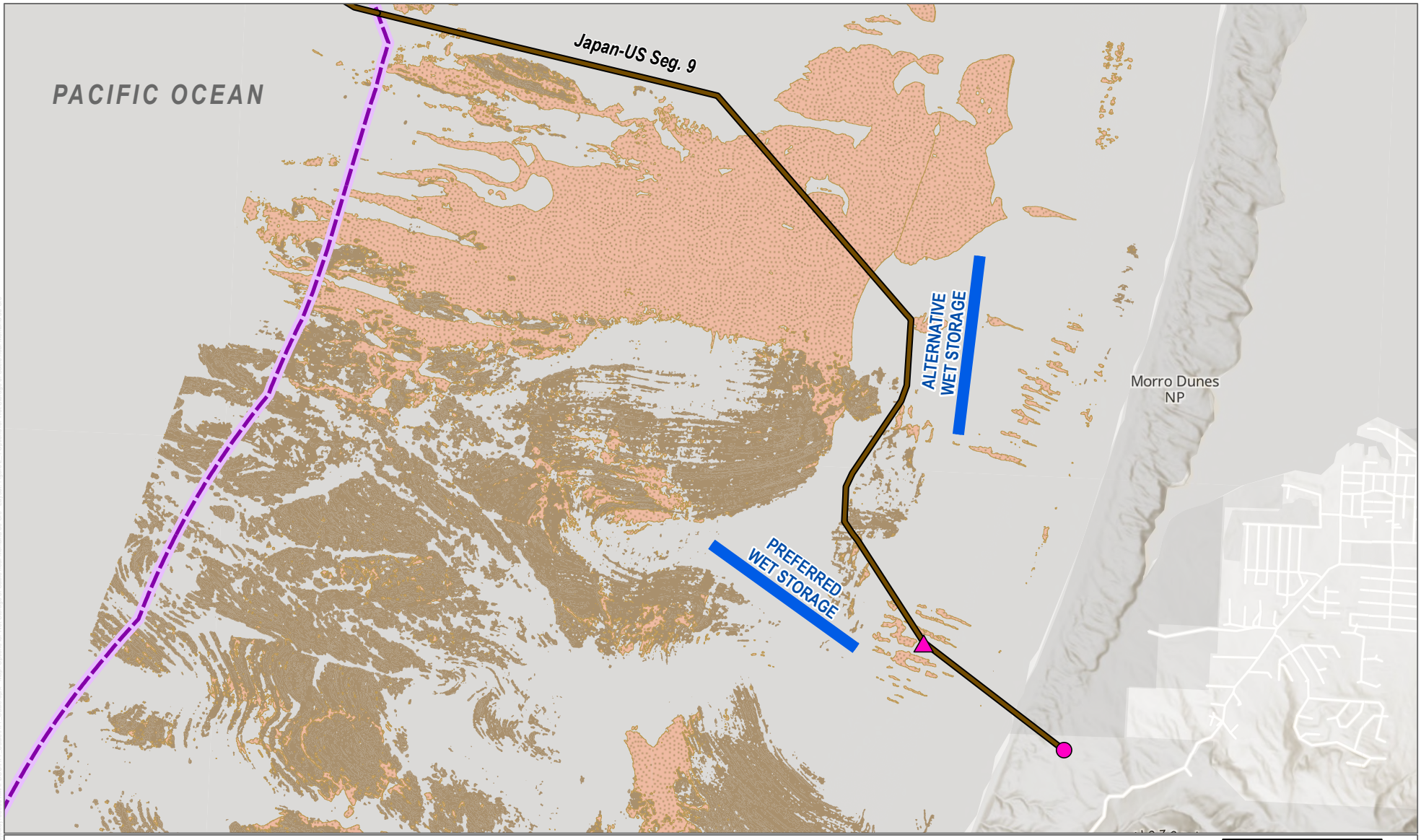
Near the conduit exit, divers would also excavate and recover cable anchors that were originally installed to secure the cable to the seafloor and are buried

approximately 4 feet deep (1.2 meters). The existing cable anchors each weigh approximately 21 pounds with a maximum dimension of 17.25 inches. Divers would recover the cable anchors to the DSV.

2.4.3.2 Conduit Cable Removal

After all activities in *Section 2.4.3.1* are completed, the DSV and divers would coordinate with the onshore crew (see *Section 2.4.2*) and prepare the segment of cable within the conduit to be lifted to a tugboat, the *A.N. Tillet* or similar. A pulling rope would be connected to the tugboat and to the cable end at the conduit exit location, and the tugboat would then pull the 4,101-foot-long conduit cable segment to the northwest, removing the remaining cable from the conduit. The conduit cable segment would trail the tugboat for approximately 3,281 feet on the seafloor as it is pulled. Once the cable segment is completely removed from the conduit, the DSV and divers would attach recovery rigging and floats to the cable segment for CRV recovery, using the methodology described in *Section 2.4.1*.

If the CRV is not immediately available to recover the cable segment due to inclement weather, the DSV and tugboat would transport the cable and floatation buoys to one of two identified wet storage areas in state waters. These wet storage areas (Figure 2-4) have been identified as sandy seafloor and would lack hard or mixed substrates (Cochrane et al. 2022). At either location, the cable would be temporarily sunk back down to the seafloor using a clump weight (a weight attached to the cable ends weighing approximately 440 pounds [200 kilograms]) for temporary storage. The clump weight would secure the cable segment and keep it from moving on the seafloor. The cable's location would be marked using GPS coordinates in the vessel's navigation system and with subsurface acoustic release buoys. The cable would then remain in wet storage for a period of 2 weeks or less, until the CRV could safely recover it. Cable recovery by the CRV would follow the process described in *Section 2.4.1*.



Montaña de Oro State Park Conduit Exit Location
Montaña de Oro State Park Utility Access Point
Temporary Wet Storage
AT&T Segment 9 Cable
California's Offshore Boundary (approx. 3 nm)

Substrate Type
Hard
Mixed

San Luis Obispo County

SOURCE: Padre Associates, Inc. 2024, ESRI Basemap (accessed 2025)

DUDEK

0 1,550 3,100 Feet

FIGURE 2-4

Montaña de Oro JUS S9 Cable Work Areas with Wet Storage Options

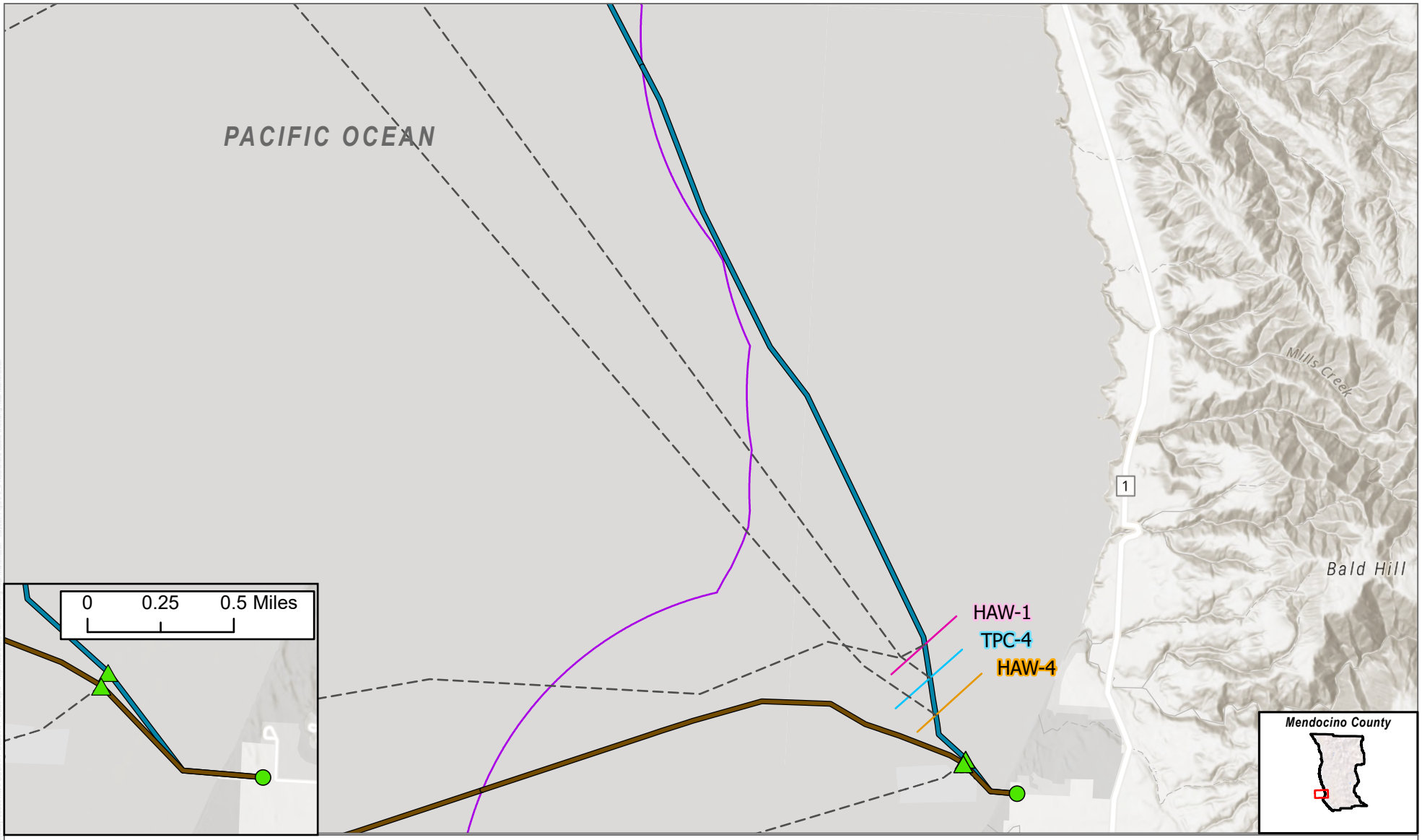
AT&T Japan- U.S. Cable Network Decommissioning

2.5 MANCHESTER JUS S9 AND JUS S8 ACTIVITIES

2.5.1 Dive Support Vessel Operations

The cable removal work for JUS S9 Manchester and JUS S8 would start in the offshore work area (Figure 2-5). The same commercial dive operation and DSV used for JUS S9 Montaña offshore activities (see *Section 2.4.3*) would be mobilized to the JUS S8 alignment after completing dive work offshore Montaña de Oro State Park. Once positioned, divers would first excavate the JUS S8 cable using hand jets and then cut it at its conduit exit location (38°59.11950' N, 124°09.25284'W) using hand tools. The DSV's anchors would then be repositioned, and the divers would excavate and cut the JUS S9 Manchester cable segment at its conduit exit location (38°59.07800' N, 123°42.96400' W) using the same process. The ends of the JUS S9 Manchester and JUS S8 conduit cables would be weighted down and reburied within the excavated trench after cutting. The excavation for both cable segments would comprise a total of 0.08 acre (3,228 square feet) of seafloor disturbance.

The DSV and support vessels would rig the seaward JUS S9 Manchester cable end with recovery rigging and buoys to float the cable to the surface and then transfer the cable end to the CRV (see *Section 2.4.3* for details on the rigging and buoys, and *Section 2.5.2* for CRV operations). After the CRV has removed all of JUS S9 Manchester, it would return to the JUS S8 conduit exit location and the DSV and support vessels would repeat the rigging and CRV transfer process for JUS S8.



Manchester State Park Conduit Exit Location
Manchester State Park Utility Access Point
AT&T Segment 9 Cable
AT&T Segment 8
HAW-1
HAW-4
TPC-4
Other Cable (not part of the AT&T Japan-US Cable Demcommissioning Project)
California's Offshore Boundary (approx. 3 nm)

SOURCE: Padre Associates, Inc. 2024, ESRI Basemap (accessed 2025)

DUDEK

0 3,750 7,500 Feet

FIGURE 2-5

Cable Crossing Area along Manchester S8 Alignment

AT&T Japan- U.S. Cable Network Decommissioning

2.5.2 Open Water Cable Recovery

Offshore cable removal for JUS S9 Manchester and JUS S8 would start with CRV recovery of each cut cable end near its conduit exit location (see *Section 2.5.1*) and removal out to California's offshore boundary (approximately 3 nm) offshore of Mendocino County. Each cable removal would then continue into federal and international waters (see *Sections 1.4 and 2.0* for more information on the 1,000-fathom depth agreement and overall cable removal activities, respectively). The temporary seafloor disturbance for the JUS S9 Manchester and JUS S8 cable removals in state waters would be 0.9 acre. While the JUS S8 cable crosses over the top of three non-Project cables (HAW-4, TPC-4, and HAW-1[5]) (see Figure 2-5), the JUS S8 cable is on top of them and there is no risk of upsetting the other cables during JUS S8 removal. JUS S9 Manchester does not intersect any other cables.

Each cable would be routed over the CRV bow roller to the traction winch and cable tension track and then into one of the internal cable tanks. The cable would be pulled vertically, in alignment with its position on the seafloor, while working from the seaward (west) side of the CRV. The width of the disturbance area would be the same as detailed in *Section 2.4.1*.

After JUS S8 activities are complete, the CRV would transit back to state waters to demobilize (see *Section 2.7* for more details on demobilization).

2.6 DEMOBILIZATION AND RECYCLING

Upon completion of all fiber optic cable removal activities, the DSV and support vessels would transit to and demobilize in Port Hueneme, Ventura County. The CRV would transit from the Project area to a mechanical dismantling/recycling factory located in Cape Town, South Africa. The ports that the tugboat and other support vessels would demobilize to are unknown at the time of IS/MND publication and would be too speculative for further consideration. The cable anchors excavated during JUS S9 Montaña activities would be disposed of in an approved facility. The work crew would remove the cones and fencing in the Sandspit parking lot when onshore work is completed at Montaña de Oro State Park.

---

[5] HAW-4 = Hawaii No. 4; TPC-4 = Trans-Pacific Cable 4; HAW-1 = Hawaii No.1.

2.7 PROJECT WORK SCHEDULE

Project operations are currently anticipated to take place from July 2026 through September 2026. All JUS S8 and JUS S9 activities, including transit time, pre-activity surveys, and demobilization, occurring between the 1,000-fathom contour and Montaña de Oro and Manchester State Parks would take approximately 39 days and 45 days, respectively. Project activities between California's offshore boundary (approximately 3 nm) and Montaña de Oro and Manchester State Parks, would take approximately 15.5 days and 26 days, respectively. Table 2-1 describes the anticipated schedule by cable segment.

It is expected that DSV activities would be conducted during daylight hours (approximately 12 hours per day), 7 days per week until dive operations are completed. Offshore CRV activities would be conducted 24 hours per day, 7 days per week until Project completion.

Table 2-1. Schedule of Project Events in State Waters by Location

Location	Task	Days[1]
JUS S9 Montaña	Pre-Decommissioning Survey	3
	Open Water Cable Recovery Vessel Operations	2
	Onshore Conduit Cable Cutting	3.5
	Dive Support Vessel Operations	7
JUS S 9 Manchester and JUS S8	Pre-Decommissioning Survey	4
	Dive Support Vessel Operations	16
	Open Water Cable Recovery Vessel Operations	6

Note:

[1] Durations for mobilization/demobilization and vessel transit are included when activities would occur within state waters.

2.8 PROJECT EQUIPMENT AND PERSONNEL

2.8.1 Work Vessels and Equipment

Cable removal would require the use of ocean-going vessels and heavy equipment. The CRV for this Project would be the M/V *Grace*, or similar vessel, a vessel that is 284 feet in length, 18.2 feet in draft, and has a transit speed of 9 knots (Figure 2-6a). The cable recovery system onboard the M/V *Grace* consists

of a bow roller and platform, one main winch, a generator, and tensioners. The main winch provides the main pulling force for recovery of the cable; the tensioner provides the required auxiliary tension for the main winch and transports the recovered cable to the cable tanks. The M/V *Grace* is equipped with four cable tanks that can store approximately 35,315 cubic feet of cable.

In addition to the CRV, the Project would use support vessels or tugboats, and a DSV. The DSV would be the M/V *Surveyor*, or a similar vessel (Figure 2-6a). The M/V *Surveyor* is 100 feet in length, 7 feet in draft, with two 600-horsepower (HP) Detroit diesel engines. The M/V *Surveyor* is also equipped with a hydraulic deck crane, a 6x6 jet pump, and two generators/compressors.

The support vessels for the Project include the *A.N. Tillet*, which is a 69.2-foot tugboat with two Mitsubishi S12R Tier 3 engines with 2,200 total HP (Figure 2-6b), or similar vessel, as well as the M/V *JAB*, which is a 46-foot survey vessel equipped with two Cummins QSC 8.3 liter 500 HP commercial diesel engines and one 1,000-pound hydraulic deck crane, or a similar vessel (Figure 2-6b).

The primary vessel operations for the Project are summarized in Table 2-2 below.

Table 2-2. Vessel Operations in State Waters Offshore Montaña de Oro and Manchester State Parks

Equipment Type	Hours/Day	# of Days in Operation
Survey Vessel	12	7
Diving Vessel – M/V *Surveyor*	12	23
Support vessel/anchor handler – M/V *JAB*	12	23
Cable Recovery Vessel – M/V *Grace*	24	8
Support vessel/tug – *A.N. Tillett*	12	9

Top Image: M/V Grace

Bottom Image: M/V Surveyor

SOURCE: Mertech Marine 2025

FIGURE 2-6a

Project Vessels

AT&T Japan- U.S. Cable Network Decommissioning

DUDEK

Top Image: A.N. Tillet

Bottom Image: M/V Jab

SOURCE: Mertech Marine 2025

FIGURE 2-6b

Project Vessels

AT&T Japan- U.S. Cable Network Decommissioning

DUDEK

2.8.2 Project Personnel

There are approximately 35 people required for the proposed work activities, as detailed in Table 2-3.

Table 2-3. Personnel Requirements

Number	Personnel Type
Onshore – Montaña de Oro	
3	Onshore Crew
3	***Subtotal***
M/V *Grace* Cable Recovery Vessel Crew	
1	Captain
1	Second Mate
1	Motorman
1	Cook
8	Cable Recovery Vessel Deck Crew
2	Mammal observers
14	***Subtotal***
***A.N. Tillett* Support Vessel/Tug Crew**	
1	Master
1	Second mate
2	Deck crew
4	***Subtotal***
M/V *Surveyor* Dive Vessel Crew	
1	Diving Support Supervisor
1	Diving Support Vessel Master
6	Diving Support Team
2	Diving Support Vessel Deck Crew
1	Marine Mammal Observer
11	***Subtotal***
M/V *JAB* Support Vessel/Anchor Handling	
1	Master
1	Second mate
1	Deck crew
3	***Subtotal***
35	**GRAND TOTAL**

3.0 ENVIRONMENTAL CHECKLIST AND ANALYSIS

This section contains the IS that was completed for the Project in accordance with the requirements of CEQA. The IS identifies site-specific conditions and impacts, evaluates their potential significance, and discusses ways to avoid or lessen impacts that are potentially significant. The information, analysis and conclusions included in the IS provide the basis for determining the appropriate document needed to comply with CEQA. For the Project, based on the analysis and information contained herein, CSLC staff has found that the IS shows that there is substantial evidence that the Project may have a significant effect on the environment but revisions to the Project would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur. As a result, the CSLC has concluded that an MND is the appropriate CEQA document for the Project.

The evaluation of environmental impacts provided in this IS is based in part on the impact questions contained in Appendix G of the CEQA Guidelines; these questions, which are included in an impact assessment matrix for each environmental category (Aesthetics, Agriculture/Forest Resources, Air Quality, Biological Resources, etc.), are "intended to encourage thoughtful assessment of impacts." Each question is followed by a check-marked box with column headings that are defined below.

Potentially Significant Impact. This column is checked if there is substantial evidence that a Project-related environmental effect may be significant. If there are one or more "Potentially Significant Impacts," a Project environmental impact report (EIR) would be prepared.

Less than Significant with Mitigation. This column is checked when the Project may result in a significant environmental impact, but the incorporation of identified Project revisions or mitigation measures would reduce the identified effect(s) to a less-than-significant level.

Less than Significant Impact. This column is checked when the Project would not result in any significant effects. The Project's impact is less than significant even without the incorporation of Project-specific mitigation measures.

No Impact. This column is checked when the Project would not result in any impact in the category or the category does not apply.

The environmental resource areas listed below would be potentially affected by this Project. These were identified because there would be at least one impact

that would be a "Potentially Significant Impact" except that the Applicant has agreed to Project revisions, including the implementation of mitigation measures, that would reduce the impact to "Less than Significant with Mitigation."

Environmental Resource Areas with Potentially Significant Impacts:

- Air Quality
- Biological Resources
- Cultural Resources
- Cultural Resources – Tribal
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Recreation
- Transportation
- Mandatory Findings of Significance

Detailed descriptions and analyses of impacts from Project activities and the basis for their significance determinations are provided for each environmental factor on the following pages, beginning with *Section 3.1, Aesthetics*. Relevant laws, regulations, and policies potentially applicable to the Project are listed in the Regulatory Setting for each environmental factor analyzed in this IS.

AGENCY STAFF DETERMINATION

Based on the environmental impact analysis provided by this Initial Study:

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent.
A MITIGATED NEGATIVE DECLARATION will be prepared.

Robin Tuohy	April 13, 2026
Signature	Date

Robin Tuohy, Environmental Scientist
Division of Environmental Science, Planning, and Management
California State Lands Commission

3.1 AESTHETICS

AESTHETICS – Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

3.1.1 Environmental Setting

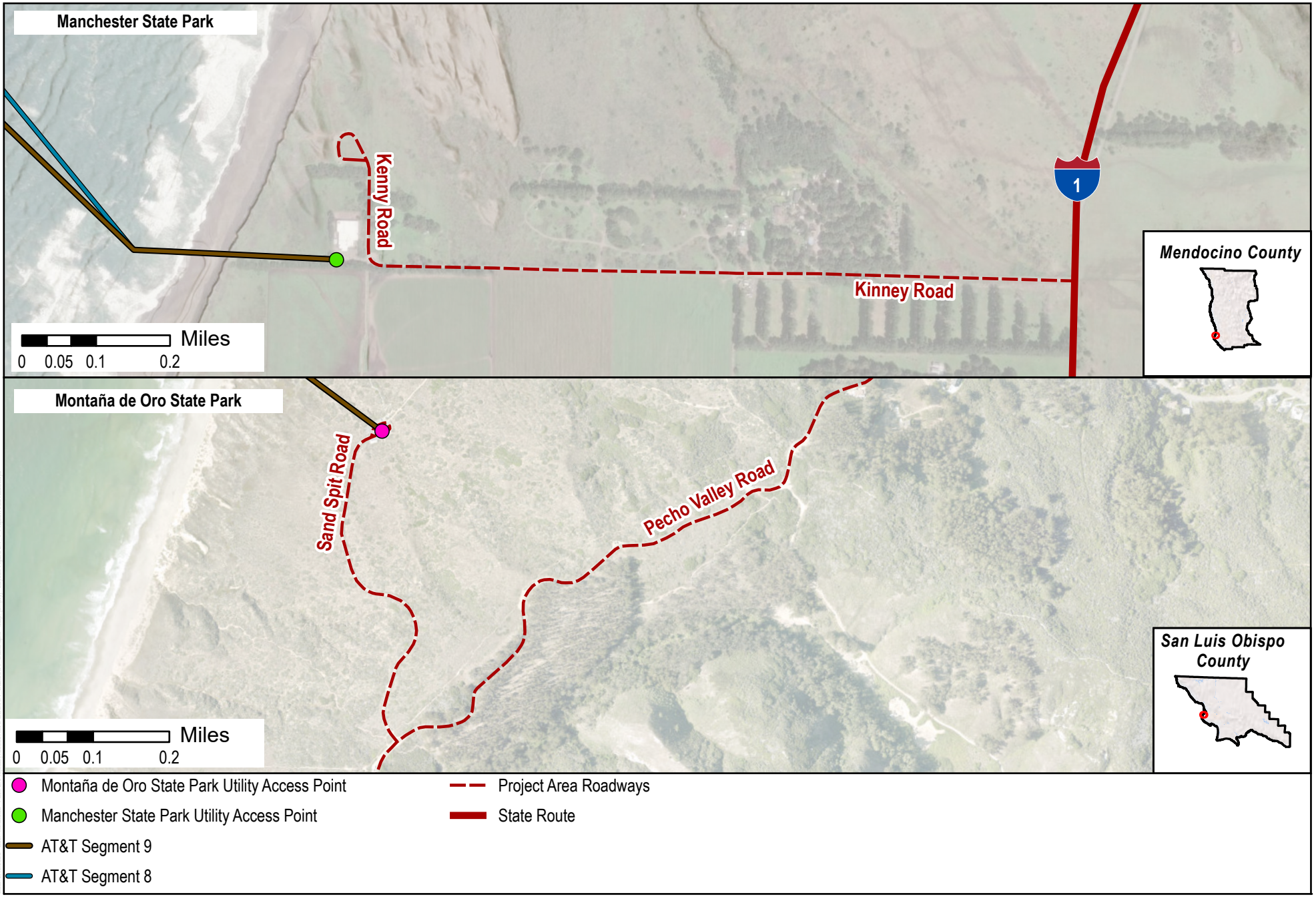
3.1.1.1 JUS S9 Montaña – San Luis Obispo County

The JUS S9 Montaña work area is in a non-urbanized area and its scenic values are from rugged cliffs, secluded sandy beaches, coastal plains, streams, canyons, and hills, and the Pacific Ocean (Padre 2024). There are no

designated scenic vistas[6] or specific scenic resources near the JUS S9 Montaña onshore and offshore work areas, according to the County of San Luis Obispo Coastal Plan Policies (County of San Luis Obispo 2007) and County of San Luis Obispo General Plan Conservation and Open Space Element (County of San Luis Obispo 2010). There are also no designated state scenic highways in the vicinity of the onshore or offshore work areas. The nearest eligible scenic highway is a segment of U.S. Route 101, located approximately 11.4 miles east of the onshore work area (Caltrans 2024).

Temporary equipment used in the onshore area would be visible to pedestrians walking on the Sandspit Trail and North Dune Connector Trail near the onshore work area as well as Sandspit parking lot users. Project vessels used in the offshore work area would be temporarily visible to visitors to Montaña de Oro State Park, Sand Spit Road and Pecho Valley Road users (Figure 3.1-1), fishing vessels and freighters (which may occasionally pass through the offshore work area), and recreationalists in the Pacific Ocean (such as boats and kayakers).

[6] Scenic vistas generally refer to views of expansive open space areas or other natural features, such as mountains, undeveloped hillsides, large natural water bodies, or coastlines. Scenic vistas are generally accessible from public vantage points, such as public roadways and parks.



SOURCE: Padre Associates, Inc. 2024, ESRI Basemap (accessed 2025)

DUDEK

FIGURE 3.1-1

Project Area Roadways

AT&T Japan- U.S. Cable Network Decommissioning

3.1.1.2 JUS S9 Manchester and JUS S8 – Mendocino County

The JUS S9 Manchester and JUS S8 work area is also in a non-urbanized area with scenic values from the beach stretches, dunes, flat grasslands, and the Pacific Ocean (Padre 2024). The onshore area adjacent to the JUS S9 Manchester and JUS S8 work activities is a designated "highly scenic area," according to the Mendocino County General Plan Coastal Element (County of Mendocino 1988, 2021). There are no designated state scenic highways in the vicinity of the onshore or offshore work areas, and the nearest eligible scenic highway is a segment of Highway 1, located approximately 1.2 miles east of the offshore work area (Caltrans 2024). Due to intervening development and distance, the offshore work area is not visible from this segment of Highway 1.

Temporary Project vessels used in the offshore work area would be visible to visitors to Manchester State Park, Kenny Road and Kinney Road users (Figure 3.1-1), fishing vessels, and freighters (which may occasionally pass through the offshore work area), and recreationalists in the Pacific Ocean (such as boats and kayakers).

3.1.2 Regulatory Setting

Federal and state laws and regulations pertaining to aesthetics and relevant to the Project are identified in Appendix A. At the local level, applicable policies and programs are included in Appendix B.

3.1.3 Impact Analysis

a) Have a substantial adverse effect on a scenic vista?

Less than Significant Impact

There are no designated scenic vistas or specific scenic resources within or near the JUS S9 Montaña work area. The onshore area adjacent to the JUS S9 Manchester and JUS S8 work activities is a designated "highly scenic area" (County of Mendocino 1988, 2021). While viewers may see the equipment and work trucks within the onshore JUS S9 Montaña work area as well as the vessels in the offshore work areas (see Figure 2-6a and Figure 2-6b for Project vessels) for JUS S9 Montaña and JUS S9 Manchester and JUS S8, all Project work activities would be temporary and would cease upon completion of the Project. The equipment and vessels would not block scenic views and would not result in permanent degradation or alteration of the character of Montaña de Oro State Park or Manchester State Park's aesthetics or an existing viewshed. The entirety

of Project work activities would last approximately 15.5 days within the JUS S9 Montaña work area and 26 days within the JUS S9 Manchester and JUS S8 work area (Table 2-1). At the end of the Project, there would be no permanent visible components. Therefore, the impact would be less than significant.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact

There are no designated scenic resources, trees, rock outcroppings, and historic buildings within a state scenic highway within the Project work areas. In addition, the Project would not damage or alter any scenic resources that would contribute to the eligibility of Highway 1 as an Eligible State Scenic Highway (Caltrans 2024), which is in the vicinity of the offshore JUS S9 Manchester and JUS S8 work activities. No streets within the vicinity of the Project work areas are designated as local scenic routes. Therefore, there would be no impact.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact

As discussed in a), above, the Project would result in temporary visual changes during Project activities (up to 26 days) that would primarily affect passing boaters and visitors to Montaña de Oro State Park and Manchester State Park. All equipment would be removed upon completion of Project activities, and there would be no permanent changes to the existing visual character or quality of public views in a non-urbanized area. Therefore, the impact would be less than significant.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than Significant Impact

Onshore Work Area

JUS S9 Montaña work activities in the onshore area would be conducted during daylight hours and no significant sources of light or glare would be used during

that time that would have the potential to affect views in the area. Sunlight reflecting off of work trucks would be similar to the existing levels of exposure from sunlight reflecting off car windshields on nearby roadways and within the Sandspit parking lot. Therefore, this impact would be less than significant.

Offshore Work Areas

Lighting in the offshore work areas would primarily be generated from Project vessels (*Section 2.8.1*) and would be visible to Pacific Ocean users and those within the vicinity of Montaña de Oro and Manchester State Parks. Work in the Pacific Ocean could occur for up to 24 hours a day for CRV activities and would last for approximately 2 days for JUS S9 Montaña work activities and 6 days for JUS S9 Manchester and JUS S8 work activities (see Table 2-2 for Project vessel operations). All Project activities would be required to comply with U.S. Coast Guard (USCG) regulations, which include navigational and safety standards requiring nighttime lighting for vessels and offshore construction equipment to ensure visibility and safe marine operations. The CRV would have some limited lighting to avoid becoming a navigational hazard to existing marine traffic. However, similar lighting is already present in the marine environment due to existing offshore and maritime activities. Therefore, this impact would be less than significant.

3.1.4 Mitigation Summary

The Project would have no significant impact to aesthetics; therefore, no mitigation is required.

3.2 AGRICULTURE AND FOREST RESOURCES

AGRICULTURE AND FOREST RESOURCES[7] - Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Natural Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Pub. Resources Code, § 12220, subd. (g)), timberland (as defined by Pub. Resources Code, § 4526), or timberland zoned Timberland Production (as defined by Gov. Code, § 51104, subd. (g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

[7] In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.

AGRICULTURE AND FOREST RESOURCES[7] - Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

JUS S9 Montaña requires an onshore work area. JUS S9 Manchester and JUS S8 do not require an onshore work area. Therefore, the IS/MND will only focus on Agriculture and Forest Resources that are relevant to the onshore work area in San Luis Obispo County.

3.2.1 Environmental Setting

Onshore activities are limited to the Sandspit parking lot within Montaña de Oro State Park. Based on the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program,[8] the Sandspit parking lot is designated as "Other Land" (DOC 2022). The Sandspit parking lot and surrounding Montaña de Oro State Park area are zoned as Recreation (County of San Luis Obispo 2025a).

The Sandspit parking lot area is not enrolled in a Williamson Act Contract by the DOC. The closest Williamson Act-contracted lands are approximately 1.7 miles east of the Sandspit parking lot (DOC 2024). There are no lands designated or zoned for agricultural use on or near the onshore work areas for JUS S9 Montaña.

[8] The California Department of Conservation's Farmland Mapping and Monitoring Program prepares maps and statistical data for analyzing land use impacts on California's agricultural resources.

3.2.2 Regulatory Setting

Federal laws, regulations, and policies pertaining to agriculture and forest resources are not relevant to the Project site. Appendix A contains the state laws, regulations, and policies pertaining to agriculture and forestry resources relevant to the Project. At the local level, no goals, policies, or regulations are applicable to the Project.

3.2.3 Impact Analysis

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Natural Resources Agency, to non-agricultural use?

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Pub. Resources Code, § 12220, subd. (g)), timberland (as defined by Pub. Resources Code, § 4526), or timberland zoned Timberland Production (as defined by Gov. Code, § 51104, subd. (g))?

d) Result in the loss of forest land or conversion of forest land to non-forest use?

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

(a to e) No Impact

The JUS S9 Montaña onshore work area lies entirely within the Sandspit parking lot. Therefore, the Project would not convert farmland to non-agricultural use or forest land to non-forest use. The JUS S9 Montaña onshore work area is not within Prime Farmland, Unique Farmland, Farmland of Statewide Importance, Farmland of Local Importance, Farmland of Local Potential, or Grazing Land as identified by DOC's California Important Farmland Finder (DOC 2022). The Project would not conflict with zoning for agricultural use or any Williamson Act contracts, forest land, timberland, or timberland production. The JUS S9 Montaña onshore work area also does not contain any forest or timberland, and there are no forest land uses within the JUS S9 Montaña onshore work area or surrounding areas, so there would be no loss of forest lands or conversion of forest lands to non-forest use. Therefore, there would be no impacts.

3.2.4 Mitigation Summary

The Project would have no impact to agriculture or forest resources; therefore, no mitigation is required.

3.3 AIR QUALITY

AIR QUALITY - Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

3.3.1 Environmental Setting

The JUS S9 Montaña onshore and offshore work areas are within San Luis Obispo County, which is in the South Central Coast Air Basin (SCCAB) and is subject to SLOAPCD air pollutant guidelines and regulations. The JUS S9 Manchester and JUS S8 offshore work area is within the North Coast Air Basin (NCAB) and is subject to Mendocino County Air Quality Management District (MCAQMD) air pollutant guidelines and regulations. Air pollutants are emitted by a variety of sources, including off-road construction equipment, on-road mobile sources (vehicles and offshore vessels), area sources (hearths, consumer product use, architectural coatings, and landscape maintenance equipment), energy

sources (natural gas), and stationary sources (generators or other stationary equipment).

3.3.1.1 Meteorological and Topographical Conditions

The climate of San Luis Obispo County is characterized as Mediterranean, with warm, dry summers and cooler, relatively damp winters. Along the coast, mild temperatures persist throughout the year due to the moderating influence of the Pacific Ocean. Inland areas are characterized by a considerably wider range of temperature conditions due to distance from the ocean and intervening terrain features, such as the coastal mountain ranges. The speed and direction of local winds are controlled by the location and strength of the Pacific high-pressure system and other global patterns, by topographical factors, and by circulation patterns resulting from temperature differences between the land and sea. In spring and summer months, when the Pacific High attains its greatest strength, onshore winds from the northwest generally prevail during the day. At night, as the sea breeze dies, weak drainage winds flow down the coastal mountains and valleys to form a light, easterly land breeze. In the Fall, onshore surface winds decline and the marine layer grows shallow, allowing an occasional reversal to a weak offshore flow (SLOAPCD 2001).

The climate of Mendocino County and the NCAB is influenced by the Pacific Ocean and mountains of the Coast Range. The Coast Range runs north to south with peaks reaching heights of approximately 9,000 feet that act as a barrier blocking moisture and wind from reaching the east side of the range, resulting in hot, dry summers and cool, snowy winters. Coastal areas experience cool summers and rainy winters. Predominant winds are from the north to northwest in the summer, and from the south to southwest in the winter. Offshore and onshore flows are common along the coast and are associated with pressure systems in the area. Onshore flows frequently bring foggy cool weather to the coast, whereas offshore flows often blow fog away from the coast (North Coast Unified Air Quality Management District 1995).

3.3.1.2 Sensitive Receptors

Sensitive receptors are those who are especially susceptible to adverse health effects from exposure to toxic air contaminants (TACs), such as children, the elderly, and the ill. Sensitive receptors include residences, schools, day care centers, nursing homes, retirement homes, and hospitals within 1,000 of a site (SLOAPCD 2023). The nearest sensitive receptors to the JUS S9 Montaña onshore

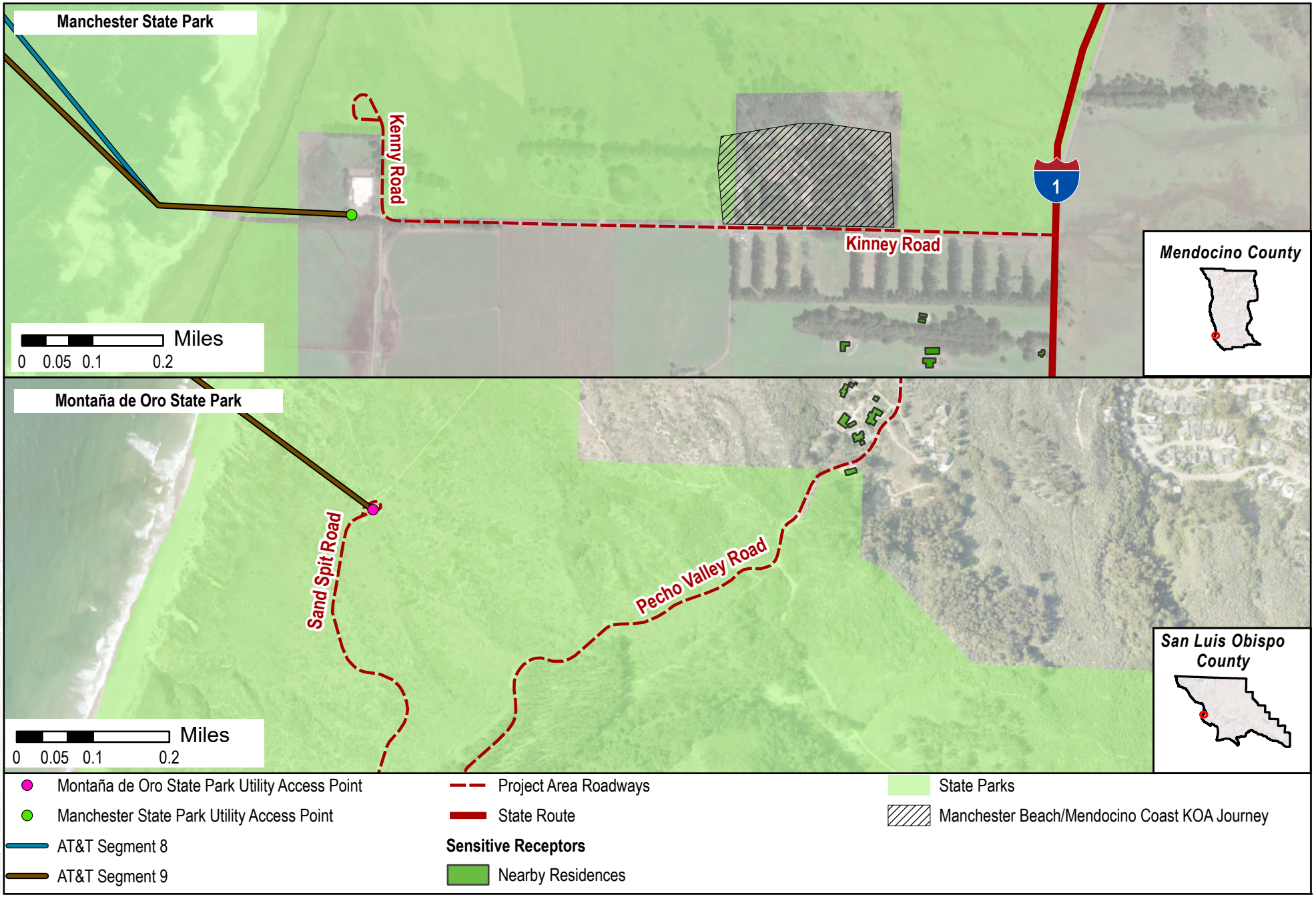
work area are the residences along Pecho Valley Road, approximately 0.6 mile to the northeast. The closest sensitive receptors to the JUS S9 Manchester and JUS S8 offshore work area are residences located approximately 0.5 mile to the east along Kinney Road (Figure 3.3-1).

3.3.1.3 Criteria Air Pollutants

Criteria air pollutants are defined as pollutants for which the U.S. Environmental Protection Agency (EPA) and California Air Resources Board (CARB) have established ambient air quality standards (AAQS) for outdoor concentrations to protect public health. The federal and state AAQS have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. For this Project, criteria air pollutants of concern include ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), coarse particulate matter (10 micrometers or less in diameter; PM_{10}), and fine particulate matter (2.5 micrometers or less in diameter; $PM_{2.5}$).

Ozone

O_3 is a strong-smelling pollutant formed in the atmosphere by a photochemical process involving the sun's energy and oxides of nitrogen (NO_x) and reactive organic gases (ROGs). The maximum effects of precursor emissions on O_3 concentrations usually occur several hours after they are emitted and many miles from the source. Meteorology and terrain play major roles in O_3 formation, and ideal conditions occur during summer and early autumn on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The O_3 that EPA and CARB regulate as a criteria air pollutant is produced close to the ground level, where people live, exercise, and breathe. O_3 in the troposphere causes numerous adverse health effects; short-term exposures (lasting for a few hours) to O_3 can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. These health problems are particularly acute in sensitive receptors such as the sick, the elderly, and young children (CARB 2025a).



SOURCE: Padre Associates, Inc. 2024, ESRI Basemap (accessed 2025)

FIGURE 3.3-1

Sensitive Receptors

AT&T Japan- U.S. Cable Network Decommissioning

DUDEK

Nitrogen Dioxide

NO_2 is a brownish, highly reactive gas that is present in all urban atmospheres. The major mechanism for the formation of NO_2 in the atmosphere is the oxidation of the primary air pollutant nitric oxide, which is a colorless, odorless gas. Both NO_2 and nitric oxide are constituents of NO_x, which is formed from fuel combustion under high temperature or pressure. NO_2 can irritate the lungs, cause bronchitis and pneumonia, and lower resistance to respiratory infections (CARB 2025b).

Carbon Monoxide

CO is a colorless, odorless gas formed by the incomplete combustion of hydrocarbon or fossil fuels. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions. The highest levels of CO typically occur during the colder months of the year, when inversion conditions are more frequent. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions (CARB 2025c).

Sulfur Dioxide

SO_2 is a colorless, pungent gas that is produced from coal and oil used in power plants and industries. SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. SO_2 is an irritant gas that affects the throat and lungs and can cause acute respiratory symptoms and diminished ventilator function in children. When combined with particulate matter, SO_2 can injure lung tissue and reduce visibility and the level of sunlight (CARB 2025d).

Particulate Matter

Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. $PM_{2.5}$ and PM_{10} represent fractions of particulate matter. PM_{10} consists of particulate matter that is 10 micrometers or less in diameter (about 1/7 the thickness of a human hair). Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; and windblown dust from open lands. $PM_{2.5}$ consists of particulate matter that is

2.5 micrometers or less in diameter (roughly 1/28 the diameter of a human hair). $PM_{2.5}$ results from fuel combustion (e.g., from motor vehicles and power generation and industrial facilities), residential fireplaces, and woodstoves. $PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. People with influenza, people with chronic respiratory and cardiovascular diseases, and the elderly may suffer worsening illness and premature death as a result of breathing particulate matter. Children may experience a decline in lung function due to breathing in PM_{10} and $PM_{2.5}$ (CARB 2025e).

3.3.1.4 Non-Criteria Air Pollutants

Non-criteria air pollutants considered in this analysis include TACs and odorous compounds.

A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute or chronic non-cancer health effects. Diesel particulate matter (DPM), which is part of a complex mixture that makes up diesel exhaust, is a TAC of key concern as it is estimated that about 70 percent of the total known cancer risk related to air toxics in California is attributable to DPM (CARB 2025f. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks. More than 90 percent of DPM is less than 1 micrometer in diameter and is a subset of $PM_{2.5}$ (CARB 2025f). DPM is typically composed of carbon particles ("soot," also called black carbon) and numerous organic compounds, including over 40 known cancer-causing organic substances. DPM is emitted from a broad range of diesel engines, including on-road diesel engines from trucks, buses, and cars and off-road diesel engines from locomotives, marine vessels, and heavy-duty construction equipment, among others. Because it is part of $PM_{2.5}$, DPM also contributes to the same non-cancer health effects as $PM_{2.5}$ exposure. These effects include premature death; hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma; increased respiratory symptoms; and decreased lung function in children. Those most vulnerable to non-cancer health effects are children whose lungs are still developing and the elderly who often have chronic health problems.

In contrast to TACs, odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). The ability to detect odors varies considerably among the population and, overall, is quite subjective. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receptors.

3.3.2 Regulatory Setting

The EPA is responsible for implementing most aspects of the Clean Air Act, including setting National Ambient Air Quality Standards (NAAQS) for criteria air pollutants. Under the California Clean Air Act, the task of air quality management and regulation has been legislatively granted to CARB, including setting California Ambient Air Quality Standards (CAAQS) for criteria air pollutants, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. Federal and state laws and regulations pertaining to air quality that are applicable to the Project are identified in Appendix A. Local regulations are detailed in Appendix B. At the federal level, EPA has jurisdiction under the Clean Air Act and has established the NAAQS to protect public health (primary standards) and welfare (secondary standards). NAAQS are established by the EPA for "criteria pollutants" under the Clean Air Act, which are O_3, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and lead. The EPA classifies an area as attainment, unclassified, or nonattainment, depending on whether the monitored ambient air quality data show compliance, insufficient data to determine compliance, or non-compliance with the NAAQS. States with areas that exceed the NAAQS must prepare a state implementation plan that demonstrates how those areas will attain the standards within mandated time frames.

At the state level, CARB has jurisdiction under the California Health and Safety Code and the California Clean Air Act and has established the more stringent CAAQS, which also require air basins to be designated as in "attainment" or "nonattainment" based on meeting the CAAQS. CAAQS have been established for O_3, CO, NO_2, SO_2, PM_{10} and $PM_{2.5}$, lead hydrogen sulfide, sulfates, and visibility-reducing particles.

CARB is responsible for the regulation of mobile emissions sources within the state, whereas local air quality management districts and air pollution control

districts are responsible for enforcing air quality standards and regulating stationary sources. SLOAPCD and MCAQMD are the regional agencies responsible for the regulation and enforcement of federal and state regulations, and the SLOAPCD, MCAQMD, and CARB ensure that all state and federal AAQS are attained.

SLOAPCD and MCAQMD are the regional agencies responsible for the regulation and enforcement of federal, state, and local air pollution control regulations in San Luis Obispo and Mendocino Counties, respectively. As discussed in *Section 1.4, Project Background and Objectives*, SLOAPCD has asserted CEQA authority to regulate air quality emissions out to California's Coastal Waters boundary (Cal. Code Regs. tit. 17 § 70500), which extends approximately 38 nm offshore from Morro Bay. The MCAQMD has asserted jurisdiction out to California's offshore boundary, located approximately 3 nm offshore Mendocino County (Stephens, pers. comm., 2026). *Section 3.3* analyzes the quantitative and qualitative criteria pollutant emission impacts consistent with each District's stated regulatory jurisdiction.

3.3.2.1 Air Quality Regulation and Planning

The EPA and CARB designate air basins (or portions thereof) as "attainment" or "nonattainment" for each criteria air pollutant, based on whether the AAQS have been achieved. Generally, if the recorded concentrations of a pollutant are lower than the standard, the area is classified as "attainment" for that pollutant. If an area exceeds the standard, the area is classified as "nonattainment" for that pollutant. The designation of "unclassifiable/ attainment" means that the area meets the standard or is expected to meet the standard despite a lack of monitoring data. San Luis Obispo County has been designated for nonattainment under the NAAQS for O_3 during an 8-hour period. Under the CAAQS, San Luis Obispo County is designated for nonattainment for O_3 in the 1-hour and 8-hour period and PM_{10} for the 24-hour and annual period. All other NAAQS and CAAQS have been attained or remain unclassified (CARB 2023). Accordingly, SLOAPCD adopted the 2001 Clean Air Plan (CAP) as its attainment plan for O_3 and PM_{10} (SLOAPCD 2001).

Mendocino County has been designated unclassified under the NAAQS for PM_{10} and the CAAQS for hydrogen sulfide. Mendocino County is currently in attainment for all other NAAQS and CAAQS (CARB 2023).

3.3.2.2 Thresholds of Significance

Appendix G of the CEQA Guidelines (Cal. Code Regs. tit. 14, §15000 et seq.) indicates that, where available, the significance criteria established by the applicable air quality management district or pollution control district may be relied upon to determine whether a project would have a significant impact on air quality.

SLOAPCD has established thresholds of significance for construction-related emissions of criteria pollutants. Table 3.3-1 summarizes the applicable SLOAPCD thresholds for the Project's air quality analysis.

Table 3.3-1. San Luis Obispo County Air Pollution Control District Air Quality CEQA Thresholds of Significance

Pollutant	Daily Emissions (pounds per day)	Quarterly Tier 1 (tons)	Quarterly Tier 2 (tons)
ROG + NO_x	137	2.5	6.3
Diesel Particulate Matter	7	0.13	0.32
Fugitive Particulate Matter (PM_{10})	N/A	2.5	N/A

Source: SLOAPCD 2023.

The MCAQMD utilizes the Bay Area Air Quality Management District's air quality threshold for the construction-related emissions for projects in Mendocino County, which is based on the CEQA Thresholds of Significance for Climate Impacts (MCAQMD 2013). Table 3.3-2 summarizes the applicable MCAQMD thresholds for the Project's air quality analysis.

Table 3.3-2. Mendocino County Air Quality Management District Air Quality CEQA Thresholds of Significance

Pollutant	Daily Emissions (pounds per day)
ROG	54
NO_x	54
PM_{10} (exhaust)	82
$PM_{2.5}$ (exhaust)	54
PM_{10}/$PM_{2.5}$ (Fugitive)	best management practices

Source: MCAQMD 2010.

3.3.3 Impact Analysis

a) Conflict with or obstruct implementation of the applicable air quality plan?

No Impact

SLOAPCD has adopted the 2001 CAP. To be considered consistent with the SLOAPCD 2001 CAP, a project must be consistent with the CAP's land use planning and transportation control measures and strategies (SLOAPCD 2023). These strategies include, but are not limited to, planning compact communities with higher densities, providing for mixed land use, and balancing jobs and housing. The Project consists of cable removal activities and would generate a small number of temporary jobs; therefore, land use planning strategies such as mixed-use development and planning compact communities are not applicable and the Project would not affect the local area's jobs/housing balance. Adopted transportation control measures include, but are not limited to, a voluntary commute options program, local and regional transit system improvements, bikeway enhancements, and telecommuting programs. The voluntary commute options program targets employers in San Luis Obispo County with more than 20 full-time employees, but the Project would not result in permanent jobs or employees. Therefore, the Project would not conflict with or obstruct implementation of the 2001 CAP.

MCAQMD has adopted the Particulate Matter Attainment Plan, which includes recommended control measures to maintain particulate matter levels below state and federal standards, including alternatives to the use of wood burning stoves/fireplaces, the use of dust control practices during construction operations, and improvement of bicycle facilities to reduce vehicle trips (MCAQMD 2005). As the Project consists of cable removal activities offshore of

Mendocino County, the Project would not involve wood burning stoves/fireplaces and would not generate dust or vehicle trips. Additionally, the Project would not involve increases in population, housing, or commercial/industrial development and would not be growth-inducing. Therefore, the Project would not conflict with the MCAQMD Particulate Matter Attainment Plan.

Therefore, there would be no impact.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?

Less than Significant with Mitigation

Past, present, and future development projects may contribute to the SCCAB and NCAB adverse air quality impacts on a cumulative basis. By its nature, air pollution is largely a cumulative impact. Based on these considerations, project-level thresholds of significance for criteria pollutants are used in the determination of whether a project's individual emissions would have a cumulatively considerable contribution to air quality (see *Section 3.3.2.2, Thresholds of Significance*). As discussed in *Section 3.3.2.1, Air Quality Regulation and Planning,* the SCCAB is listed as "attainment" or "unclassified" for all NAAQS and CAAQS, except that San Luis Obispo County is nonattainment for the 8-hour O_3 NAAQS, 1-hour and 8-hour O_3 CAAQS, and 24-hour and annual PM_{10} CAAQS. Mendocino County has been designated unclassified under the NAAQS for PM_{10} and the CAAQS for hydrogen sulfide and is currently in attainment for all other NAAQS and CAAQS. The following discussion focuses on short-term construction emissions since the Project would not result in any operational activities.

Proposed Project work activities would result in the temporary addition of pollutants to the local airsheds from off-site sources (e.g., on-road utility trucks, worker vehicle trips, and marine vessels). Emissions from Project work activities would vary substantially from day to day depending on the level of activity, the specific type of operation (e.g., use of marine vessels such as the CRV and its onboard equipment), and, for particulate matter, the prevailing weather conditions. Therefore, such emission levels can only be estimated.

JUS S9 Montaña Work Area

The Project's JUS S9 Montaña onshore work activity emissions were estimated using the California Emissions Estimator Model (CalEEMod) Version 2022.1.

Internal combustion-engines used by work trucks/worker vehicles would result in emissions of volatile organic compounds, nitrogen oxides (NO_x), CO, and PM_{10}. PM_{10} and $PM_{2.5}$ emissions would also be generated by entrained dust, which results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil.

JUS S9 Montaña offshore work activities would require the use of specialized surface and underwater construction equipment such as a CRV, DSV, and ROV. Marine vessel emissions were estimated for removal of the JUS S9 Montaña cable out to 38 nm (see *Section 3.3.2*) using emission factors, load factors, and average HP of the most representative vessel type in the CARB Port Emissions Inventory Guidance and EPA's Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories. See Appendix C for additional details.

Work activities would take place from July 2026 through September 2026. Table 3.3-3 presents the estimated maximum daily criteria pollutant emissions generated during Project work activities within the SLOAPCD jurisdiction. The calculations in Appendix C assumed a construction start date in 2026, which represented the earliest date Project work activities would initiate. This analysis assumes that the earliest start date for Project work activities represents the worst-case scenario for criteria air pollutant and greenhouse gas (GHG) emissions because equipment and vehicle emission factors for later years would be slightly less due to (1) more stringent standards for in-use off-road equipment and heavy-duty trucks, and (2) fleet turnover replacing older equipment and vehicles in later years.

Table 3.3-3 and Table 3.3-4 present the estimated maximum daily and quarterly construction emissions generated by JUS S9 Montaña work activities within the SLOAPCD jurisdiction, respectively.

Table 3.3-3. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions – SLOAPCD

Year	ROG + NO_x	$PM_{2.5}$	DPM (PM_{10})	CO	SO_x
	Pounds per day				
2026	1,932	37.3	38.4	1,910	42.2
SLOAPCD Threshold	*137*	—	*7*	—	—
Threshold Exceeded?	**Yes**	**—**	**Yes**	**—**	**—**

Source: Appendix C.

Table 3.3-4. Estimated Quarterly Construction Criteria Air Pollutant Emissions – SLOAPCD

Year	ROG + NO_x	$PM_{2.5}$	DPM (PM_{10})	CO	SO_x	FD
	Total Project Emissions (Tons)					
2026	14.58	0.281	0.289	3.88	0.318	0.0003
SLOAPCD Threshold Tier 1	*2.5*	—	*0.13*	—	—	*2.5*
Threshold Exceeded?	**Yes**	—	**Yes**	—	—	—
SLOAPCD Threshold Tier 2	6.3	—	0.32	—	—	—
Threshold Exceeded?	**Yes**	**—**	**No**	**—**	**—**	**No**

Source: Appendix C.

As shown in Tables 3.3-3 and 3.3-4, the Project's unmitigated emissions would exceed all of the daily and most of the quarterly SLOAPCD thresholds for ROG + NO_x and DPM (PM_{10}) emissions and result in a potentially significant impact. **Mitigation Measure** (**MM**) **AQ-1a** would reduce or offset ROG + NO_x and DPM emissions from the proposed Project to below the SLOAPCD's significance thresholds through the purchase of emission offset credits. With the implementation of this measure, the impact would be less than significant.

MM AQ-1a: Reactive Organic Gases (ROG) + Nitrogen Oxides (NO_X) and Diesel Particulate Matter (DPM) Emission Offset Credits - San Luis Obispo Air Pollution Control District (SLOAPCD). No later than 30 days prior to the commencement of Project-related construction activities, the Applicant or its designee shall provide evidence to CSLC staff that ROG + NO_X and DPM emission offset credits have been purchased to offset the Project's ROG + NO_X and DPM emissions that exceed their respective SLOAPCD construction significance thresholds.

JUS S9 Manchester and JUS S8 Offshore Work Areas

Table 3.3-5 presents the estimated maximum daily Project work activities emissions generated by JUS S9 Manchester and JUS S8 work activities within the MCAQMD jurisdiction.

Table 3.3-5. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions – MCAQMD

Year	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per day					
2026	56	621	1,910	18.3	15.9	14.9
MCAQMD Threshold	*54*	*54*	—	—	*82*	*54*
Threshold Exceeded?	**Yes**	**Yes**	**—**	**—**	**No**	**No**

Source: Appendix C.

As shown in Table 3.3-5, the Project's unmitigated work activities emissions would exceed the maximum daily MCAQMD thresholds for ROG and NO_x and result in a potentially significant impact. **MM AQ-1b** would offset NO_x emissions from the proposed Project to below the MCAQMD's significance threshold through funding emission reduction projects that achieve ROG and NOx reductions within the NCAB. With the implementation of this measure, the impact would be less than significant.

MM AQ-1b: Reactive Organic Gases (ROG) and Nitrogen Oxides (NO_X) Emission Offset Credits - Mendocino County Air Quality Management District (MCAQMD). No later than 30 days after the completion of Project-related activities, the Applicant or its designee shall provide funding to MCAQMD for implementation of offsite emission reduction projects that achieve real, quantifiable ROG and NO_X reductions within the North Coast Air Basin. The Applicant shall deposit funds with

MCAQMD in an amount sufficient to offset the project's ROG and NO_X emissions that exceed the applicable MCAQMD significance thresholds. The offset quantity shall be calculated using MCAQMD-approved emission factors and methodologies.

MCAQMD shall apply the funds exclusively to eligible ROG or NO_X reducing projects and the MCAQMD's administrative costs, which may include but are not limited to:

- Replacement or retrofit of diesel engines (stationary or mobile)
- Agricultural pump engine electrification
- Woodstove change out programs
- Incentives for low ROG and NO_X equipment or vehicles
- Other MCAQMD approved emission reduction programs that meet state and federal criteria for surplus reductions

The Applicant shall provide documentation to CSLC from MCAQMD demonstrating receipt of funds, identification of the potential emission reduction project(s) to be funded, and the estimated ROG and NO_X reductions sufficient to offset the project's ROG and NO_X emissions that exceed the applicable MCAQMD significance threshold. If MCAQMD determines that additional reductions are needed to fully offset the Project's ROG and NO_X emissions, the Applicant shall notify CSLC staff and provide supplemental funding to MCAQMD until the performance standard is met.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact

The nearest sensitive receptors to the JUS S9 Montaña onshore work area are along Pecho Valley Road, approximately 0.6 mile to the northeast, and the closest sensitive receptors to the JUS S9 Manchester and JUS S8 offshore work area are onshore and approximately 0.5 mile to the east along Kinney Road (Figure 3.3-1). Potential exposure of sensitive receptors to substantial TAC and criteria air pollutant concentrations is evaluated below.

Project work activities would result in emissions of DPM from the utility truck and pickup truck used to transport the work crew to the JUS S9 Montaña onshore

work area (*Section 2.4.2*) as well as the marine vessels used for offshore work activities. The Office of Environmental Health Hazard Assessment has identified carcinogenic and chronic noncarcinogenic effects from long-term exposure (30-year exposure period) but has not identified health effects due to short-term exposure to diesel exhaust. Health risk assessments should also be limited to the period/duration of activities associated with the Project (OEHHA 2015).

The duration of Project work activities (45.5 days within SLOAPCD jurisdiction and 26 days within MCAQMD jurisdiction) would constitute only a small percentage of the total long-term exposure period. Offshore work activities would be conducted a significant distance from onshore residential sensitive receptors and, thus, would not result in exposure of these sensitive receptors to substantial TACs. Moreover, as discussed previously in question (b), above, the Project would not include any long-term activities. Therefore, the impact would be less than significant.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact

The Project is not anticipated to result in other emissions that have not been addressed in questions (a) through (c), above. As such, this analysis focuses on the potential for the Project to generate odors from short-term construction emissions.

Odors created from both onshore and offshore work activities would be generated from vehicles, marine vessels, or equipment exhaust emissions during the Project's temporary work activities and would come from released concentrations of unburned hydrocarbons. Such odors would disperse rapidly from the Project work areas and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, the impact would be less than significant.

3.3.4 Mitigation Summary

Implementation of the following mitigation measures would reduce the potential for Project-related impacts to air quality to less than significant.

- **MM AQ-1a: Reactive Organic Gases (ROG) + Nitrogen Oxides (NO_X) and Diesel Particulate Matter (DPM) Emission Offset Credits - San Luis Obispo Air Pollution Control District (SLOAPCD)**

- **MM AQ-1b: Reactive Organic Gases (ROG) and Nitrogen Oxides (NO_X) Emission Offset Credits – Mendocino County Air Quality Management District (MCAQMD)**

3.4 BIOLOGICAL RESOURCES

BIOLOGICAL RESOURCES – Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, or that is a species of interest to the State Lands Commission or the California Coastal Commission; or cause a marine wildlife population to drop below self-sustaining levels?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, State Lands Commission, or California Coastal Commission?	☐	☒	☐	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through	☐	☐	☒	☐

BIOLOGICAL RESOURCES – Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
direct removal, filling, hydrological interruption, or other means?				
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (including essential fish habitat)?	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	☐	☐	☐	☒

3.4.1 Environmental Setting

The following discussion is based on information from the Marine Biological Resources Study (MBRS), prepared by Padre Associates Inc. (2024), included as Appendix D-1. The findings of the MBRS were based on a literature review and desktop study of available Project design information, historical CSLC lease information, and regional marine biological geospatial data from CDFW. The desktop study also included a review of federally listed Threatened and

Endangered species lists obtained from the U.S. Fish and Wildlife Service (USFWS), California Natural Diversity Database, and the National Marine Fisheries Service (NMFS). Species habitat preferences were analyzed by Padre Associates Inc., and included in the MBRS, by reviewing the results of Post-Installation Burial Verification ROV inspection surveys (tables that summarize 2015 surveys are included in Appendix D-2).

The MBRS analyzed AT&T's overall decommissioning project (see *Section 1.4, Project Background and Objectives,* for more information on cable removal out to 1,000 fathoms), which includes vessel corridors and potential anchoring areas that are not considered part of the Project analyzed in this IS/MND. The biological study area for this IS/MND encompasses Project work areas within California's offshore boundary, which includes the onshore and offshore work areas for JUS S9 Montaña and the offshore work area for JUS S9 Manchester and JUS S8. Acreages, distances, or species potential to occur have been further refined within *Section 3.4* to reflect solely the areas and activities that are part of the Project.

3.4.1.1 Terrestrial Habitat, Terrestrial Wetlands, and Terrestrial Special Status Species

The JUS S9 Montaña onshore work area is limited to the Sandspit parking lot in Montaña de Oro State Park (*Section 2.2.1*). The Sandspit parking lot is a paved area that does not provide suitable habitat for any special status species and lacks sensitive vegetation communities, natural drainages, or water courses capable of supporting riparian habitat. The presence of wetland features for the JUS S9 Montaña onshore work area was assessed using the USFWS National Wetlands Inventory mapper and no wetlands are mapped in that work area. Therefore, onshore Project activities are not discussed or analyzed further in *Section 3.4*.

3.4.1.2 Benthic Habitats near the Conduit Exit Points

Post-Installation Burial Verification ROV inspections were conducted in 2003, 2005, 2010, and 2015 along the JUS S9 and JUS S8 cable routes. The sedimentation of the seafloor found near the JUS S9 Montaña conduit exit point offshore San Luis Obispo County has been characterized by soft sandy patches interspersed with rocky outcrops, pebbles, and boulders, which increase with the JUS S9 Montaña cable's distance from shore (Appendix D-1). The sedimentation of the seafloor found near the JUS S9 Manchester and JUS S8

conduit exit points offshore Mendocino County is characterized by sand close to shore, and then a few areas of rocky outcrops and harder substrate mixed in with the sand as JUS S9 Manchester and JUS S8 move offshore (Appendix D-1).

Areas with rocky substrate are more likely to support macro algae such as giant kelp (*Macrocystis pyrifera*) or bull kelp (*Nereocystis luetkeana*), which in turn support numerous fish species such as blue rockfish, (*Sebastes mystinus*), California sheephead, (*Bodianus pulcher*), and Lingcod (*Ophiodon elongatus*) (Appendix D-1). The canopy kelp Habitat of Particular Concern (HAPC) includes those waters, substrate, and other biogenic habitat associated with canopy-forming kelp species (e.g., *Macrocystis* spp. and *Nereocystis* spp.). These habitats have been shown to have some of the highest primary productivity in the marine environment and provide a significant contribution to the marine and estuarine food webs. While the area offshore Montaña de Oro State Park has suitable substrate for kelp forest habitat, and the JUS S9 Manchester and JUS S8 offshore work area contains a HAPC designation for Canopy Kelp, Landsat satellite imagery analysis of historic kelp canopy cover shows no record of kelp forest habitat or Canopy Kelp occurring within any of the Project offshore work areas (Appendix D-1).

3.4.1.3 Open Water and Pelagic Habitats

The open water and pelagic habitat within the Project's offshore work areas supports migration and foraging habitat for marine mammals, reptiles, avifauna, fish, and invertebrates.

Open waters within the Project's offshore work areas can support resident coastal pelagic species including Pacific sardine *(Sardinops sagax caerulea),* Pacific mackerel *(Scomber japonicus),* northern anchovy *(Engraulis mordax),* California market squid *(Doryteuthis (Loligo) opalescens*), jack mackerel *(Trachurus symmetricus)*, and krill, which are important prey species for many higher trophic levels (Appendix D-1). Species such as Pacific leatherback sea turtle (*Dermochelys coriacea*) and short-tailed albatross (*Phoebastria (=Diomedea) albatrus*) migrate across the Pacific Ocean from nesting to foraging/feeding areas that include the offshore work areas. Other species such as the oceanic whitetip shark (*Carcharhinus longimanus*) prefer the surface waters near the continental shelf where pelagic prey species such as tuna and marlin are often found. Acoustic studies in the general vicinity of the Project area found beaked whales, sperm whales (*Physeter macrocephalus*), Dall's

porpoise (*Phocoenoides dalli),* and harbor porpoises *(Phocoena phocoena)* present in offshore waters (Appendix D-1).

3.4.1.4 Wildlife

The benthic seafloor, shallow, coastal, and open water habitats within the Project area provide habitat for a wide variety of resident and migratory wildlife species. Special status wildlife species (i.e., endangered, threatened, rare, or other special status species) occurring, or potentially occurring, within the Project area and surrounding area are summarized in Table 3.4-1 in *Section 3.4.1.5*.

The composition, topography, water depth, and other physical characteristics of marine communities determine the diversity and abundance of wildlife species residing in the Project area. Wildlife species known to occur within the offshore Project area region are discussed below.

Invertebrates

The epifauna of the shallower sedimentary habitats typically includes several species of macro-invertebrates, including sea stars, Pacific sand dollars (*Dendraster excentricus*), and slender crabs (*Cancer gracilis*), as well as polychaete worms and mollusks. The rocky substrata tend to support a more diverse epibiota, comprised of macrophytic algae, urchins (*Strongylocentrotus* spp.), sea stars, and cnidarians (anemones and solitary corals). Abalone are known to inhabit nearshore rocky reef habitats along the central California coast and would not occur at the depths of the offshore work area.

Birds

Bird species commonly associated with open waters near Montaña de Oro and Manchester State Parks have the potential to occur in the offshore waters near the Project area. These birds include but are not limited to pelagic cormorants (*Urile pelagicus*), brown pelicans (*Pelecanus occidentalis*), loons (*Gavia* sp.), gulls (*Larus spp*.), surf scoters (*Melanitta perspicillata*), and sooty shearwaters (*Ardenna grisea*) (Appendix D-1). These marine bird species feed on small schooling fish, squid, and zooplankton, and forage in open water where prey is concentrated near the water's surface.

Fish

Fish assemblages off central and northern California are comprised of both year-round residents and migratory species. The abundance of some year-

round residents, such as northern anchovy, may fluctuate as new cohorts of juveniles migrate inshore or develop from larvae during spring and summer months. The Project area provides habitat for fish species such as anchovy, sardine, and topsmelts (*Atherinidae*) that feed on midwater plankton or other midwater fishes. In addition, isolated hard substrate features may occur in portions of the open water Project area, and any hardbottom deeper reefs would attract different assemblages of fishes, primarily rockfish (*Sebastes* sp.), whereby some species show low site fidelity (a species' tendency to return to specific locations or habitat) and wide-ranging movements, whereas others exhibit high site fidelity and small vertical movements. Finally, various migratory managed fish species may also be present in the epipelagic (the uppermost layer of the ocean to approximately 200 meters) and mesopelagic (the oceanic layer between 200 and 1,000 meters) waters), including albacore tuna (*Thunnus alalunga*), bigeye tuna (*Thunnus obesus*), blue shark (*Prionace glauca*), broadbill swordfish (*Xiphias gladius*), common thresher shark (*Alopias vulpinus*), Northern bluefin tuna (*Thunnus thynnus*), shortfin mako shark (*Isurus oxyrinchus*), and skipjack tuna (*Katsuwonus pelamis*). There are no known or suspected spawning areas in the offshore work areas, but those are not well documented or described in literature.

Marine Mammals and Sea Turtles

Baleen whales, toothed whales (including dolphins), and pinnipeds such as California sea lion (*Zalophus californianus)* and Pacific harbor seal (*Phoca vitulina richardii*) could occur in the Project area. Some species of marine wildlife are seasonally present within the Project area whereas others are resident species. All marine mammals are protected under the Marine Mammal Protection Act (MMPA) of 1972, and their estimated populations near the Project offshore work areas are detailed in Table 4-3 of Appendix D-1.

Although rarely encountered, marine turtles could potentially occur within the Project area. Marine turtle populations have declined rapidly due to poaching, pollution, climate change, as fishing bycatch, and habitat destruction of nesting sites in tropical coastal areas. Sea turtles breed at sea and the females return to their natal beaches to lay their eggs; however, sea turtles do not nest anywhere along the California coast.

Wildlife Corridors

Multiple species of cetaceans (whales, dolphins, and porpoises), marine turtles, and pinnipeds (seals and sea lions) have been recorded within the waters

offshore Mendocino and San Luis Obispo Counties. Pinnipeds and some dolphins are year-round residents, with Pacific harbor seals and California sea lions found within the Project area using beaches, rocky headlands, floating docks, and pier loading decks as haul-out areas. Other marine species are fully or partially migratory, such as the gray whale (*Eschrichtius robustus*) and humpback whale (*Megaptera novaeangliae*) and are more abundant during specific months. However, baleen whales can be present throughout the year on the California coast, especially humpback, fin (*Balaenoptera physalus*), and minke (*Balaenoptera acutorostrata*) whales.

The Project area also intersects with the Pacific Flyway, which is a major north-south migratory corridor for birds in North America. Bird species generally travel the same route every year through the Pacific Flyway in both spring and fall, following food sources, heading to breeding areas, or traveling to overwintering sites.

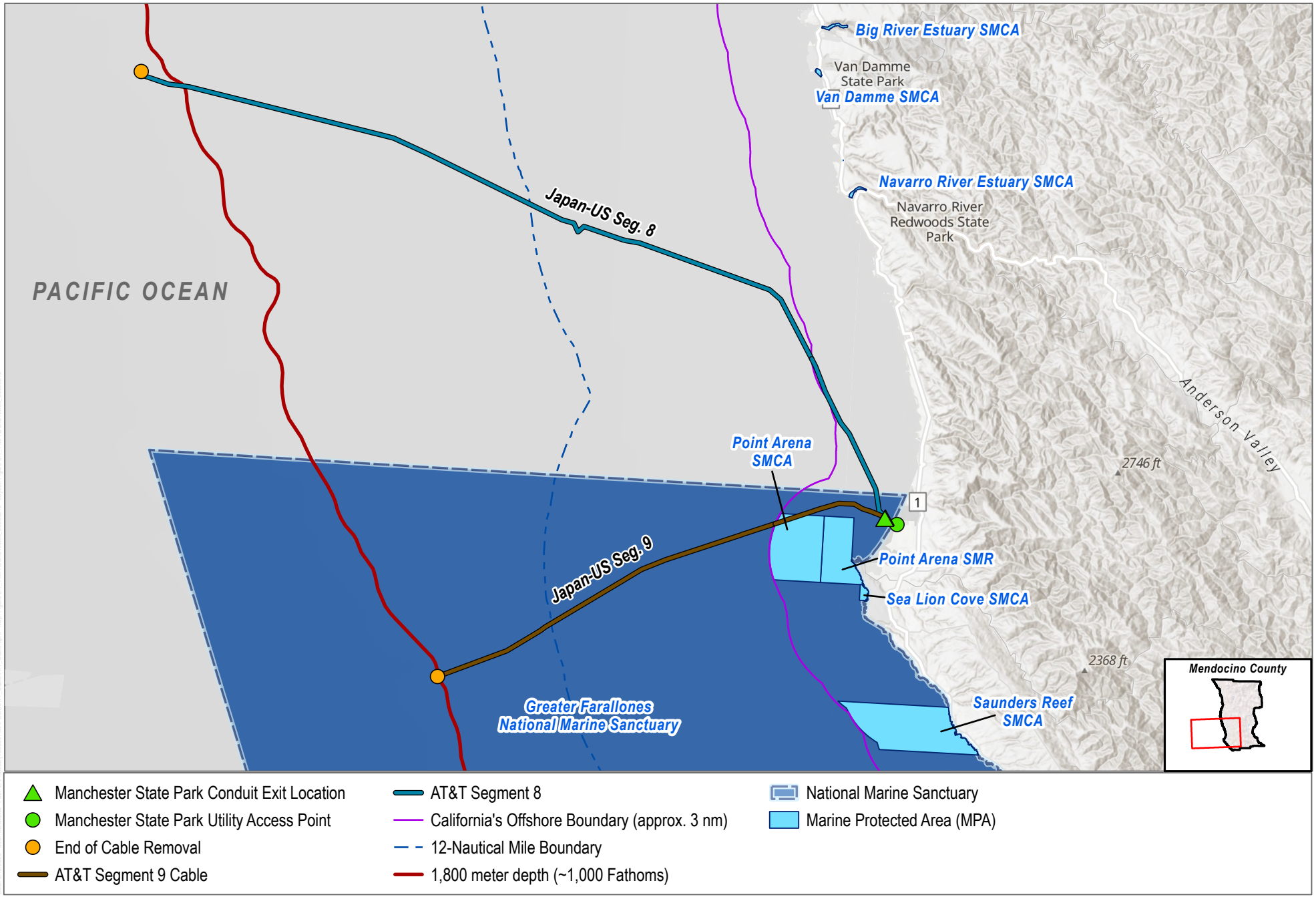
3.4.1.5 Sensitive Habitats and Protected Areas

Marine Protected Areas and National Marine Sanctuaries

The JUS S9 Manchester cable route passes through the Point Arena MPA State Marine Conservation Area, which has a total area of approximately 6.7 square miles (17.4 square kilometers). Within this area, the JUS S9 Manchester cable intersects with the MPA for approximately 1.24 miles (approximately 2 kilometers)[9] to its westernmost extent (3 nm state waters boundary) before the cable continues west toward the outer continental shelf (Figure 3.4-1).

The JUS S8 and JUS S9 Manchester cables are routed through the Greater Farallones National Marine Sanctuary for approximately 1.7 miles (2.7 kilometers) and 32.5 miles (52.3 kilometers), respectively. The Greater Farallones National Marine Sanctuary encompasses approximately 3,295 square miles (8,534 square kilometers) of ocean between Point Arena and San Francisco.

[9] The Marine Biological Resources Study prepared by Padre Associates Inc. (Appendix D-1) incorrectly states that the JUS S9 cable intersects the Point Arena MPA State Marine Conservation Area for 4.3 miles (6.9 kilometers).



SOURCE: Padre Associates, Inc. 2024, ESRI Basemap (accessed 2025)

DUDEK

0 15,000 30,000 Feet

FIGURE 3.4-1

Marine Protected Areas and National Marine Sanctuaries

AT&T Japan- U.S. Cable Network Decommissioning

Critical Habitats

The Project area intersects within the designated critical habitat area for southern distinct population segment (sDPS) green sturgeon (*Acipenser medirostris*), leatherback sea turtle (*Dermochelys coriacea*), southern resident killer whale (*Orcinus orca)*, and Mexico distinct population segment (DPS) and central America DPS humpback whale (*Megaptera novaeangliae*).

3.4.1.1 Special Status Species

The MBRS provides the results for the literature review and species lists obtained from USFWS (IPaC Trust Resource Report, Project codes 2024-0011145 [Manchester] and 2024-0011160 [Morro Bay]), California Natural Diversity Database, and NMFS (Appendix D-1) that identify several special status and protected marine species having the potential to occur in both the JUS S9 Montaña and JUS S9 Manchester and JUS S8 Project areas. Appendix D-1 lists special status species with occurrences within a 5-mile radius surrounding the Project areas (Table 4-2 of Appendix D-1),includes rationale for why certain species were considered unlikely to occur or absent from the Project area, and provides population estimates for MMPA species in the vicinity of the Project area (Table 4-3 of Appendix D-1). Table 3.4-1 below lists special status species with moderate to high likelihood to occur in the Project areas. As explained in Appendix D-1, the Project may be located outside of the known range of some species, or within the geographic range for a certain species, but lacking suitable habitat, such as nesting or breeding grounds.

Twenty-eight migratory special status or protected species have a moderate to high likelihood of occurrence in the JUS S9 Montaña Project area, whereas 31 species considered special status or protected under the MMPA have a moderate to high likelihood of occurrence in the JUS S9 Manchester and JUS S8 Project area. These species are listed in Table 3.4-1.

There are no special status or protected plants that are expected to occur in the Project areas due to lack of suitable habitat. In addition, there are no special status or protected invertebrates that are expected to occur in the Project areas. Black abalone (*Haliotis cracherodii*) and sunflower sea star (*Pycnopodia helianthoides*) are both species that may occur in the Project region; however, Project activities would occur outside of the species' preferred habitats or currently recorded depth ranges.

Table 3.4-1. Potential Occurrence of Special Status Species in the Project Area

Scientific Name	Common Name	Status	Probability of Occurrence
Birds			
Brachyramphus marmoratus	Marbled Murrelet	FT	High: JUS S9 Manchester and JUS S8
Phoebastria (=Diomedea) albatrus	Short-Tailed Albatross	FE	Moderate: JUS S9 Manchester and JUS S8
Fishes			
Acipenser medirostris	sDPS Green Sturgeon	FT	Moderate: JUS S9 Manchester and JUS S8
Oncorhynchus mykiss irideus	Northern California DPS Steelhead	FT	Moderate: JUS S9 Manchester and JUS S8
Oncorhynchus kisutch	Central California Coast Coho Salmon	FE	Moderate: JUS S9 Manchester and JUS S8
Oncorhynchus mykiss irideus	South-Central California Coast steelhead	FT	Moderate: JUS S9 Montaña
Oncorhynchus tshawytscha	California Coastal Chinook Salmon	FT	Moderate: JUS S9 Manchester and JUS S8
Reptiles			
Caretta caretta	North Pacific Loggerhead Sea Turtle	FE	Moderate: Both Project Areas
Chelonia mydas	Green Sea Turtle	FT	Moderate: Both Project Areas
Dermochelys coriacea	Leatherback sea turtle	FE	Moderate: Both Project Areas

Table 3.4-1. Potential Occurrence of Special Status Species in the Project Area

Scientific Name	Common Name	Status	Probability of Occurrence
Mammals			
Cetaceans			
Balaenoptera musculus	Blue whale	FE	Moderate: Both Project Areas
Balaenoptera physalus	Fin whale	FE	Moderate: Both Project Areas
Balaenoptera acutorostrata	Minke whale	MMPA	High: Both Project Areas
Berardius bairdii	Baird's beaked whale	MMPA	High: Both Project Areas
Delphinus capensis	Long-beaked common dolphin	MMPA	High: JUS S9 Montaña
Delphinus delphis	Short-beaked common dolphin	MMPA	High: Both Project Areas
Tursiops truncatus	Bottlenose dolphin	MMPA	High: Both Project Areas
Grampus griseus	Risso's dolphin	MMPA	High: Both Project Areas
Eschrichtius robustus	California gray whale	FDL, MMPA	High: Both Project Areas
Globicephala macrorhynchus	Short-finned pilot whale	MMPA	High: Both Project Areas
Lissodelphis borealis	Northern right-whale dolphin	MMPA	High: Both Project Areas
Megaptera novaeangliae	Central America DPS Humpback whale	FE	High: Both Project Areas
	Mexico DPS	FT	High: Both Project Areas
Mesoplodon spp.	Mesoplodont beaked whales	MMPA	Moderate: Both Project Areas

Table 3.4-1. Potential Occurrence of Special Status Species in the Project Area

Scientific Name	Common Name	Status	Probability of Occurrence
Orcinus orca	Southern resident Killer Whale	FE	High: JUS S9 Manchester and JUS S8
Orcinus orca	West Coast Transient killer Whale	MMPA	High: Both Project Areas
Phocoena phocoena	San Francisco Russian River Harbor Porpoise	MMPA	High: JUS S9 Manchester and JUS S8
Phocoena phocoana	Morro Bay Harbor Porpoise	MMPA	High: JUS S9 Montaña
Phocoenoides dalli	Dall's porpoise	MMPA	Moderate: Both Project Areas
Physeter macrocephalus	Sperm whale	FE	Moderate – Both Project Areas
Stenella coeruleoalba	Striped Dolphin	MMPA	High: JUS S9 Montaña; Low: JUS S9 Manchester and JUS S8
Ziphius cavirostris	Cuvier's beaked whale	MMPA	Moderate: Both Project Areas
Pinnipeds			
Callorhinus ursinus	Northern fur seal	MMPA	Moderate: Both Project Areas
Eumetopias jubatus	Steller sea lion	MMPA	Moderate: JUS S9 Manchester and JUS S8
Mirounga angustirostris	Northern elephant seal	MMPA	High: Both Project Areas
Phoca vitulina richardii	Pacific harbor seal	MMPA	High: Both Project Areas
Zalophus californianus	California sea lion	MMPA	High: Both Project Areas

Table 3.4-1. Potential Occurrence of Special Status Species in the Project Area

Scientific Name	Common Name	Status	Probability of Occurrence
Fissiped			
Enhydra lutris nereis	Southern sea otter	FT, SP	Moderate: JUS S9 Montaña

Source: Appendix D-1.
Notes: FE = federal endangered; FT = federal threatened; MMPA = Marine Mammal Protection Act; SP = State Fully Protected.

3.4.2 Regulatory Setting

Federal and state laws and regulations pertaining to biological resources and relevant to the Project are identified in Appendix A. At the local level, policies and programs are identified in Appendix B.

On April 15, 2025, NMFS issued an Endangered Species Act Section 7(a)(2) concurrence letter and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Response to the U.S. Army Corps of Engineers (USACE) consultation request required under the Clean Water Act Section 404. NMFS concurred with USACE's conclusions that Project activities are not likely to adversely affect the NMFS Endangered Species Act–listed species or designated critical habitat.

3.4.3 Impact Analysis

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, or that is a species of interest to the State Lands Commission or the California Coastal Commission; or cause a marine wildlife population to drop below self-sustaining levels?

Less than Significant with Mitigation

3.4.3.1 Impacts to Special Status Species

Marine Mammals

Offshore Project activities including vessel movement; anchor placement; cable removal; inadvertent spills; and the noise, lighting, and human presence associated with Project activities have the potential to adversely impact marine mammals including special status species such as whales and dolphins (Table 3.4-1).

Collisions and Entanglement

Collisions between ships and marine mammals occur when mammals are close to the surface of the ocean. An animal coming to the surface to breathe could be struck directly by a vessel and an animal just below the ocean surface could be cut by a vessel's propeller. However, lethal vessel strikes are more likely to occur from vessels with limited visibility that are travelling at speeds greater than 14 knots (speeds faster than the speed of travel for Project operations). Regardless, collisions with Project vessels would be considered a potentially significant impact. **MM BIO-1** would ensure that all Project personnel have a baseline understanding of the species that may occur in the offshore work areas and their responsibilities to comply with regulatory requirements and other mitigation measures. **MMs BIO-2** and **BIO-3** would protect all marine wildlife and reduce potential impacts during vessel transit and cable removal by detecting special status species in the Project area and modifying Project work activities until the risk to the species has passed. With implementation of these measures, the impact would be less than significant.

MM BIO-1: Pre-Activity Worker Environmental Training. A marine wildlife monitor (MWM) approved by the National Marine Fisheries Service (NMFS) will conduct a pre-Project marine wildlife training seminar for all Project personnel working in the offshore work areas prior to initiation of Project work activities. The MWM credentials shall be provided to CSLC staff for concurrence no later than 30 days prior to the training. The purpose of the seminar is to educate Project personnel on the identification of marine wildlife in the Project area and to provide an overview of the wildlife mitigation measures that will be implemented during the Project. Specifically, the training seminar will include, but will not be limited to, the following:

- Review of a presentation or pamphlet developed for the Project on the most common types of marine wildlife likely to be encountered in the Project area and the types of Project activities that have the most potential for affecting wildlife, with emphasis on marine mammals
- Identification of marine wildlife expected to occur in the Project area and periods of occurrence within the offshore work areas including their general habits, distribution, and methods to avoid impacts
- Overview of the Marine Mammal Protection Act, Endangered Species Act, California Endangered Species Act, and California Fish and Game Code, the agencies responsible for enforcement of these acts and regulations, and penalties associated with violations of the acts and regulations
- Procedures to be followed during mobilization/demobilization, and transiting of Project vessels, anchoring of Project vessels, and throughout cable removal activities
- Reporting requirements in the event of an inadvertent collision and/or injury to marine wildlife
- A listing of contact numbers for easy access should an inadvertent collision or injury occur.

The monitor will maintain a log of all Project personnel who attend the training and provide the most current version upon request to CSLC. If new personnel join the Project after the initial training, a new training must be provided to those new workers and their attendance

recorded. The complete log will be submitted to CSLC upon Project completion.

MM BIO-2: National Marine Fisheries Service (NMFS)–Approved Marine Wildlife Monitor. A marine wildlife monitor (MWM) approved by the National Marine Fisheries Service (NMFS) will be present during offshore cable removal activities. Monitors shall be trained in identification of federally protected marine species and recognition of behavioral traits that indicate disturbance, aggression, and other adverse responses that may be elicited during human activities in the marine environment. Monitors shall be able to identify marine mammals, turtles, and birds protected by state or federal laws (marine wildlife) from the cable recovery vessel (CRV) and support vessels during all marine cable removal activities. The MWM credentials shall be provided to CSLC staff for concurrence no later than 30 days prior to cable removal activities.

Monitors shall be positioned at the best available vantage points with an unobstructed 360-degree view of the water or the widest field of view possible, subject to safety considerations. Monitors shall observe the area around Project vessels to facilitate the maintenance of a safe distance (328 feet [100 meters]) between Project vessels and marine wildlife.

Monitors will use night-vision lenses during nighttime removal activities so that close-range marine wildlife can be observed and appropriate measures taken to avoid interactions. If marine wildlife is observed within 328 feet (100 meters) of Project vessels, the monitor shall notify the crews and progress will slow or cease until the animal has moved a safe distance from the cable and support vessels. If an encounter occurs during cable removal operations, the monitor will slow or stop progress and monitor the cable for signs of potential contact with the marine wildlife. Monitors shall have the authority to halt operations, if suspending operations will not jeopardize the safety of the crew or the work vessels, until the risk of a conflict has passed.

Project personnel will carefully contain and remove garbage and food waste from Project vessels to minimize attracting predatory and

scavenging birds. If an injured bird is discovered on a vessel, the bird will be transported on the next returning work vessel to an approved wildlife care facility. If the bird is listed under the federal Endangered Species Act or California Endangered Species Act or designated Fully Protected under the California Fish and Game Code, the injury shall be reported as soon as possible to U.S. Fish and Wildlife Service and/or the California Department of Fish and Wildlife, respectively. The nearest approved wildlife care facility will be contacted upon transport of the bird. The incapacitated bird will be reported on the daily monitoring summary report and added to a cumulative log submitted to CSLC at the completion of the Project.

The monitor team shall provide daily sighting reports to the appropriate regulatory agencies (NMFS, USFWS, and/or CDFW depending on the species involved), as well as a written report to CSLC as well as NMFS, USFWS, and/or CDFW within 30 days of completion of Project activities in state waters. The reports shall detail the monitoring observations including species observed, avoidance measures taken to prevent interactions with federally protected species during installation, and a summary of incidents, if any.

MM BIO-3: Modify Vessel Operations. Vessels operating within 328 feet (100 meters) of marine mammals, turtles, and birds protected by state or federal laws (marine wildlife) will modify operations and implement the following measures:

- Vessels shall maintain a minimum distance of 328 feet (100 meters) from the sighting location, unless the animal(s) pursue, approach, or otherwise refuse to move away from the vessel despite the efforts of crew to establish separation.
- Vessels shall not be permitted to cross directly in front of, or intersect, the path of sighted individuals.
- If marine wildlife are passing alongside the ship, the vessel operator shall maintain a steady heading and constant speed that is not faster than the sighted individuals' speed, maintaining the 328-foot (100-meter) buffer unless the individuals' behavior makes this infeasible as described above.

- If sighted individuals demonstrate defensive or disturbed actions, the vessel shall reduce speed until the approved marine wildlife monitor (MWM) determines that the animal (s) has calmed and/or moves outside of the 328-foot (100-meter) buffer. Suspending operations or taking the vessel out of gear will occur if it does not jeopardize the safety of the crew or the work vessels.

If marine wildlife comes within 328 feet (100 meters) of the vessels during cable removal, the approved MWM will have the authority to suggest modifications in vessel operations and cable removal until the animal moves safely out of the area or remains unobserved for 15 minutes.

Cable recovery rigging poses a short-term risk of entangling marine mammals while cables are being recovered to the CRV. In addition, Project vessels would require anchoring during certain cable removal activities (e.g., excavation of the conduit exit locations [see *Section 2.2*]), and marine wildlife could become entangled with anchor lines or vessel hoses involved in anchoring. **MMs BIO-1** through **BIO-3** would reduce overall conflicts between special status species and vessels, and **MM BIO-4** would ensure that a marine wildlife monitor survey anchorage areas for marine wildlife prior to deployment and determine when it is safe for anchors to be deployed, and be responsible for response measures to be taken and required notifications in the event of an entanglement. With implementation of these measures, the impact would be less than significant.

After the Project activities are complete, the removed fiber optic cables would result in a long-term reduction in entanglement risk, especially from secondary entanglement wherein fishing nets or lines become attached to exposed cable and can then entangle marine mammals.

MM BIO-4: Avoid Anchor Impacts to Marine Wildlife. Immediately prior to lowering the anchors into position, the approved marine wildlife monitor (MWM) will survey the Project area for the presence of any marine wildlife. Upon approval from the MWM that the Project area is clear of marine wildlife, the anchoring of the Project vessel may proceed. In the event that marine wildlife is identified within the Project

area, anchoring procedures will be delayed until the animal(s) move a safe distance from the Project area, as determined by the MWM. In the event that a marine mammal or sea turtle becomes entangled in any anchor chain or lines, the Project team will stop all work and consult the captain and winch operator for guidance on what actions can be safely taken to address the entanglement (e.g., slacking or cutting the line). The MWM shall immediately notify National Marine Fisheries Service (NMFS) and/or California Department of Fish and Wildlife (CDFW) and request guidance on appropriate response measures. The MWM will ensure that those response measures are implemented, as allowed by the captain based on safety of the crew and vessel.

Immediately following any disentanglement effort, a verbal report shall be made to the regulatory agencies (CSLC, NMFS, U.S. Fish and Wildlife Service, and/or CDFW depending on the species involved), followed by a written report.

Noise

Offshore Project activities such as excavation around the conduit exit points using hand jets, cable cutting, vessel transit and anchoring, as well as use of recovery equipment on the deck of the CRV, could temporarily increase ambient noise levels in the local marine environment. However, these noise levels are not expected to exceed the impact thresholds of marine mammals or be loud enough to result in incidental harassment (Appendix D-1). Noise created by vessels and equipment would be similar to noise generated by non-project commercial and recreational vessels in both Project areas (refer to *Section 3.14.3, Noise – Impact Analysis,* for more information on noise generated by Project vessels). Therefore, the impact would be less than significant.

Lighting

Lighting generated by Project vessels while conducting nighttime operations in the offshore work areas has the potential to attract marine mammal prey species such as squid, which could subsequently attract marine mammals. Such attraction could increase the risk of entanglement with anchor lines or rigging. Shipboard lighting could also disrupt the night/day cycle for those individuals that respond to the prey species or those within the lit area. **MM BIO-5** would limit lighting to that needed for regulatory compliance and safety, reducing

potential for prey attraction and disorientation of marine mammals. With implementation of this measure, the impact would be less than significant.

MM BIO-5: Vessel Lighting. The number and wattage of lights will be limited to the minimum necessary for complying with U.S. Coast Guard safety and navigation standards. Searchlights may be used occasionally for short-term navigation and safety reasons.

Oil Spills

Special status marine mammals could also be impacted by incidental oil spills. Marine wildlife exposed to oil spills could experience skin contamination, loss of buoyancy, and loss of locomotive capabilities, as well as direct lethal toxicity or sub-lethal irritation. Baleen whales, such as humpback whales, blue whales, and gray whales are particularly vulnerable because of their surface feeding behavior, and oil accumulates on and near the surface due to its lower density than seawater. Spills can also impact the prey species upon which special status marine mammals depend, resulting in additional indirect impacts. Implementation of **MM HAZ-1** (Vessel Waste Management Plan) and **MM HAZ-2** (Shipboard Oil Pollution Emergency Plan) would ensure hazardous materials are managed and stored properly to reduce the oil spill potential, and establish a protocol for notification and clean-up to reduce the impact if a spill occurs. With implementation of these measures, the impact would be less than significant.

Birds

Marbled murrelets have the potential to be present in the JUS S9 Manchester and JUS S8 offshore work area during non-breeding season (late summer through early spring), as do short-tail albatross, which forage over extensive areas of the continental shelf. Project activities and vessel operations could temporarily impact the foraging patterns of special status bird species in certain open surface waters. However, the offshore work area does not provide unique or important habitat for these species, and if they are displaced from the offshore work area it is expected that they would easily find suitable replacement foraging habitat.

Garbage and food waste generated as part of the Project vessel operations could attract these species to the vessels and increase the potential for injury or incapacitation. **MM BIO-2** would contain and remove the waste as well as ensure the marine wildlife monitor detects and responds, as necessary, to any

injured or incapacitated birds. Birds could also become exposed to oil spills and experience skin contamination, loss of buoyancy, and loss of locomotive capabilities, as well as direct lethal toxicity to or sub-lethal irritation. **MM HAZ-2** would be implemented to reduce impacts from spills and requires spill prevention and response procedures, including emergency protocols and agency notifications. With implementation of these measures, the impact would be less than significant.

Sea Turtles

Collisions between ships and sea turtles can occur when they surface to breathe and bask during feeding or travelling activities. With poor hearing and vision, sea turtles can't easily detect when a boat is nearby. This time at the surface makes sea turtles more vulnerable and susceptible to boat strikes. In addition, sea turtles are vulnerable to a short-term risk of entanglement during cable recovery operations and associated anchoring. Collision, entanglement, and vessel noise impacts to sea turtles would be similar to the marine mammal impacts discussed above, and **MMs BIO-1** through **BIO-4** would reduce overall conflicts between sea turtles and vessels. With implementation of these measures, the impact would be less than significant.

Lighting generated by Project vessels while conducting nighttime operations in the offshore work areas could temporarily alter foraging behavioral patterns of sea turtles in the immediate vicinity by creating minor disorientation near the vessels, which could alter their ability to find local food sources. However, this impact would be temporary and localized for a transitory, migrating species. Therefore, the impact would be less than significant. In addition, any impacts from nighttime lighting would be further minimized by **MM BIO-5**.

Sea turtles could also be impacted by incidental oil spills. Any sea turtles traversing through areas containing material oil spills or other pollutants may experience immediate health effects. Spills can also impact the prey species upon which special status sea turtles depend, resulting in additional indirect impacts. **MM HAZ-2** would require spill prevention and response procedures, including emergency protocols and agency notifications. With implementation of this measure, the impact would be less than significant.

Fishes

Special status fish species with potential to occur in the Project area are anadromous (species that live in saltwater but return to home streams to spawn in

freshwater) and inhabit zones higher up in the water column and will not be directly impacted by Project activities on the seafloor. However, they may still be indirectly impacted by noise and lighting from the vessels. Noise impacts to fish would be similar to the marine mammal impacts discussed above. Lighting generated by Project vessels while conducting nighttime operations in the offshore work areas could affect foraging behavior, reproductive cycles, disrupt internal clocks, and increasing vulnerability to predators. **MM BIO-5** would limit lighting to that needed for regulatory compliance and safety, reducing potential for foraging, reproductive, or other activity changes as well as disorientation.

Special status fish species could also be impacted by incidental oil spills. Potential effects would include genetic damage, morphological deformities, altered growth and development, decreased body size, inhibited swimming abilities, and mortality. **MMs HAZ-1** and **HAZ-2** would be implemented to ensure hazardous materials are managed and stored properly to reduce the oil spill potential and to establish a protocol for notification and clean-up to reduce the impact if a spill occurs. With the implementation of these measures, the impact would be less than significant.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, State Lands Commission, or California Coastal Commission?

Less than Significant with Mitigation

3.4.3.2 Impacts to Sensitive Natural Communities

Cable Removal and Anchoring

As noted in *Sections 3.4.1.2 and 3.4.1.5*, the offshore work areas encompass HAPCs and MPAs, which are categories of marine sensitive natural communities (Figure 3.4-1). The HAPC of canopy kelp was identified near the JUS S9 Manchester and JUS S8 conduit exit points, which could be disturbed by Project activities including diver assisted cable removal and vessel anchoring. The Project has identified wet storage areas outside of HAPC (i.e., hard bottom and rocky substrates) to reduce impacts to those habitats and their associated species, such as groundfish and other reef dwelling species. In those areas where the cable would be removed from where it currently lies on top of rocky substrates, the cable would be pulled up vertically to avoid dragging over sensitive areas or scouring the rock habitat (see *Sections 2.4.1 and 2.5.2, Open Water Cable*

Recovery). In addition, **MM BIO-6** requires preparation and implementation of best management practices for anchoring during cable removal and recovery that minimize conflicts with hard bottom habitat and canopy kelp. With implementation of this measure, the impact would be less than significant.

MM BIO-6: Marine Safety and Anchoring Plan. The Applicant will prepare and implement a Marine Safety and Anchoring Plan for any marine vessels requiring anchoring. The Plan shall be submitted to CSLC for approval at least 30 days prior to the initiation of Dive Support Vessel (DSV) activities. The Plan shall describe the offshore work activities for which vessel anchoring is required, including anchoring arrangements, and general procedures for deploying and recovering anchors. Anchoring locations shall avoid Habitat Areas of Particular Concern (HAPC) (i.e., hard bottom and rocky substrates, canopy kelp). The Plan shall include:

- The positioning of anchors used to anchor support vessels to locations that avoid damage to HAPC from the anchors. If alternative anchor sites without HAPCs cannot be identified, consultation with U.S. Fish and Wildlife Service and National Marine Fisheries Service shall be required prior to finalization of the Plan.
- Additional protective measures such as anchor deployment speeds (to avoid impacts to epifaunal fishes and invertebrates).
- A requirement for the Applicant to provide visual evidence (i.e., photos) that the anchors and related equipment have been fully recovered. The Plan shall also include a requirement to conduct post-Project bathymetric surveys if evidence cannot be provided showing that anchors and related equipment are fully recovered. Any such surveys must be completed within 1 month after anchors have been removed to verify that no Project debris is present. The anchoring plan will specify that the area must be returned to pre-project conditions if Project-related debris is present in the post-Project survey.

Spills and Vessel Discharges

The Project would require use of several marine vessels and equipment (see *Section 2.8.1, Work Vessels and Equipment*) to support cable removal activities. It is possible that marine vessels could discharge fuel or other hazardous fluids, sewage water, bilge water, or debris into the marine environment. Generally, these discharges are prohibited within the Greater Farallones National Marine

Sanctuary, which overlaps a portion of the JUS S9 Manchester and JUS S8 offshore work area (see Figure 3.4-1). Depending on the size and contents of the release, sensitive marine areas could be significantly impacted. **MMs HAZ-1** and **HAZ-2** would ensure hazardous materials are managed and stored properly to reduce the potential for spills and establish a protocol for notification and clean-up to reduce the impact if a spill occurs. With implementation of these measures, the impact would be less than significant.

In addition, all Project vessels arriving at the JUS S9 Montaña and JUS S9 Manchester and JUS S8 offshore work areas are potential vectors of non-native species. Vessel discharges of ballast water and the vessel's wetted surfaces could host non-native species, including barnacles (acorn and gooseneck), bryozoans, hydroids, serpulid worms, spirorbids, algal tufts, coralline algae, and amphipods. Release of these non-native species to the marine environment could result in introduction or spread of invasive species into sensitive marine areas, with resultant impacts to native species and ecosystems (Coutts et al. 2010). The California Marine Invasive Species Act and associated implementing regulations (see Appendix A) require vessels to manage ballast water and vessel biofouling to minimize the risk of introducing non-native species into California waters. These requirements include the development and implementation of ballast water and biofouling management plans, recording of ballast water and biofouling management practices in onboard logbooks, and compliance with applicable requirements for ballast water exchange or treatment and appropriate use of strategies to minimize biofouling accumulation. California's Marine Invasive Species Program also regularly inspects vessels for compliance with the law. In addition to the California requirements, all vessels operating in U.S. waters must comply with the provisions of EPA's Vessel General Permit (see Appendix A) to manage discharges incidental to the normal operation of a vessel, including ballast water. Therefore, the impact would be less than significant.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less than Significant Impact

3.4.3.3 Impacts to Marine Wetlands

The JUS S8 and JUS S9 cables intersect with designated marine wetlands offshore Montaña de Oro and Manchester State Parks. However, as JUS S9 Manchester and JUS S8 work activities do not include an onshore component, Project activities would have no impact on the marine wetland off the coast of Manchester State Park.

Cable removal activities around the conduit exit points and cable removal from the seafloor by the CRV would disturb sediments and temporarily increase turbidity in the water column to a minor level. Diving operations (*Sections 2.4.3 and 2.5.1*) would require the use of hand jets and hand tools to expose the conduit exit and cut the cable for recovery by the CRV. JUS S9 Montaña cable would also be pulled from the inside the conduit and dragged a distance along the seafloor before it would be recovered by the CRV or transported to a temporary wet storage area, if required (see *Section 2.4.3.2, Conduit Cable Removal*). While excessive increases in turbidity have the potential to suffocate nearby filter feeding invertebrates and bury other benthic species, turbidity generated by the Project's seafloor excavation for cable removal would be localized, temporary, and would not substantially affect water quality within the offshore work areas. Due to the small diameter of the cables (see *Section 2.1, Cable Specifications*) and shallow burial depths, no long-term trenching impacts or voids in the sediment are expected to occur. Following cable removal, the sandy seafloor benthic habitat is expected to be restored to pre-Project conditions through the movement of natural currents and sedimentation processes. Therefore, the impact would be less than significant.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than Significant Impact

3.4.3.4 Impacts to Migratory Corridors and Nursery Sites

Marine Mammals

As identified in *Section 3.4.1.4, Wildlife*, multiple species of cetaceans (whales, dolphins, and porpoises) and pinnipeds (seals and sea lions) have been recorded within the waters offshore Mendocino and San Luis Obispo Counties (see Table 3.4-1 for species with moderate or high likelihood to occur). Some

species are seasonally present within the Project area, whereas others are resident species. Many special status marine mammals, such as federally listed blue whales, are also migratory. The longest duration of offshore Project activities would involve a single vessel, the CRV, that would steadily move offshore at low speeds while the cable is spooled onto the vessel. While vessels would remain stationary and anchored during both the cable cutting at the seafloor conduit exits and the cable recovery from within the JUS S9 Montaña conduit, there would be no more than four vessels in a small and localized offshore area. If marine mammals are transiting the offshore work areas during any of those operations, they would be able to shift their position to avoid the vessels. Therefore, the impact would be less than significant.

Birds

The Project area intersects with the Pacific Flyway, which is a major north-south migratory corridor for birds in North America. The stationary vessels anchored near the conduit exit points could temporarily affect the foraging or migration patterns of special status bird species in certain open surface waters. However, Project activities would not occur within a large enough geographic area or be of a long enough duration to disrupt migratory movement. Therefore, the impact would be less than significant.

Sea Turtles

Although rarely encountered, marine turtles could potentially occur within the Project area, particularly in the JUS S9 Montaña offshore area. Sea turtles breed at sea and the females return to their natal beaches to lay their eggs; however, sea turtles do not nest along the California coast. As such, Project activities would not impact the ability of sea turtles to access nursery sites. Some sea turtles do migrate to California to feed, but these movements are generally from west to east and not along the shoreline. The brief presence of Project vessels in the nearshore area as well as the single CRV recovering cable out to California's offshore boundary, and beyond, would not substantially disrupt sea turtle movement and migratory patterns. Therefore, the impact would be less than significant.

Fishes

Ocean currents and temperatures create migratory corridors for fish species. In addition, the offshore work areas include essential fish habitat for highly migratory fish species. While potential impacts could occur from offshore vessels

during cutting and removal of cables, the Project vessels would generally move steadily away from the shoreline during cable removal and would only remain anchored near the JUS S9 Montaña conduit for a few days. This minor, localized, and short-term presence would not significantly affect the movement of migratory fish species and would not impair use of nursery sites that could be in the vicinity of the offshore Project area. Therefore, the impact would be less than significant.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (including essential fish habitat)?

Less than Significant with Mitigation

3.4.3.5 Conflicts with Local Policies or Ordinances

The Project is in compliance with the Mendocino County General Plan Coastal Element (2021) and the County of San Luis Obispo Coastal Plan (2007), which each mandate the protection of environmentally sensitive habitat. Due to the temporary nature of the Project, as well as implementation of monitoring and contingency plans (**MM BIO-1**, **MM BIO-2**, **MM BIO-3**, **MM BIO-4**, **MM BIO-5**, **MM BIO-6**, **MM HAZ-1** and **MM HAZ-2**) to protect special status species, migratory species, and their habitats, no significant impacts to environmentally sensitive habitat within the Project area are anticipated. Project activities would avoid HAPC to the extent feasible to reduce habitat impacts for groundfish and other reef dwelling species. *Section 3.4.3.2, Impacts to Sensitive Natural Communities,* discusses Project activities, potential impacts, and related mitigation for HAPC. With implementation of these measures and those discussed in *Section 3.4.3.2*, the impact would be less than significant.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

No Impact

3.4.3.6 Conflicts with Adopted Habitat Conservation Plans

The JUS S9 Montaña and JUS S9 Manchester and JUS S8 work areas do not overlap with a CDFW Natural Community Conservation Plan/Habitat Conservation Plan area. The Project areas are not mapped within any onshore conservation areas, linkages, or habitat reserves. The Project would comply with

the biological goals and policies set forth by the County of San Luis Obispo and County of Mendocino Coastal Plans (see *Section 3.4.3.5*), as well as all applicable state regulations, including the California Endangered Species act and Marine Life Protection Act. Therefore, there would be no impact.

3.4.4 Mitigation Summary

Implementation of the following mitigation measures would reduce the potential for Project-related impacts to biological resources to less than significant.

- **MM BIO-1: Pre-Activity Worker Environmental Training**
- **MM BIO-2: National Marine Fisheries Service (NMFS)-Approved Marine Wildlife Monitor**
- **MM BIO-3: Modify Vessel Operations**
- **MM BIO-4: Avoid Anchor Impacts to Marine Wildlife**
- **MM BIO-5: Vessel Lighting**
- **MM BIO-6: Marine Safety and Anchoring Plan**
- **MM HAZ-1: Vessel Waste Management Plan**
- **MM HAZ-2: Shipboard Oil Pollution Emergency Plan**

3.5 CULTURAL RESOURCES

CULTURAL RESOURCES- Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

3.5.1 Environmental Setting

This section discusses Cultural and Historic resources, as well as pre-contact archaeological resources that are affiliated with the Native people who have inhabited the Los Osos and Manchester areas for millennia. The ethnographic and archaeological context related to the Native American society and culture in the Project vicinity is discussed in *Section 3.6, Cultural Resources – Tribal*. However, cultural resources discussed in this section do include pre-contact archaeological resources.

The Project work areas for marine cultural resources consist of two proposed cable alignments (JUS S9 Montaña and JUS S9 Manchester and JUS S8). A search of the CSLC Shipwrecks Database (www.slc.ca.gov/shipwrecks/), included in Appendix E (Marine Archaeological and Cultural Resources Study), revealed a total of 38 potential shipwrecks in the vicinity of the JUS S9 Manchester and JUS S8 offshore work area. The search did not locate any shipwrecks within the JUS S9 Montaña offshore work area. The oldest shipwreck is the *Fannie*, a pilot boat that was wrecked in 1852, and the most recent is *Star of the Sea*, a fishing boat that was wrecked in 1961 (Appendix E). Except as verified by actual surveys, CSLC data on shipwrecks was taken from books,

newspapers, and other contemporary accounts that do not contain precise locations. The CSLC Shipwrecks Database reflects information from many sources and generally does not reflect actual fieldwork. Additionally, not all shipwrecks are listed in the CSLC Shipwrecks Database and their listed locations may be inaccurate, as ships often were salvaged or re-floated. It should be noted that *in-situ* remains of shipwrecks may be partially or wholly obscured by sediments and in rocky strata along the ocean floor in the Project work area and undetected during the cable removal activities.

3.5.1.1 Cultural Setting

The Spanish and Portuguese explorers were the first documented foreign visitors to California during the sixteenth and seventeenth centuries. They primarily traveled along the coast by ocean, with a focus on mapping and naming geographic features, and interactions with the indigenous populations were limited. Gaspar de Portolá led the first Spanish land expedition in September 1769 through San Luis Obispo County, traveling near the modern town of Guadalupe and Nipomo Dunes to the site of Pismo Beach (Padre 2024). In 1774, the Juan Bautista de Anza expedition passed over the same route as Portolá had 5 years before him. This expedition made two stops in San Luis Obispo County, including one at the present Mission location on April 15, 1774, and a second at the Nacimiento River on April 16, 1774 (Padre 2024).

In northwestern California, it was the Russians who settled first with the establishment of a temporary camp in Bodega Bay in 1809 and a more permanent settlement in Fort Ross (approximately 40 miles south of the Manchester Project area) in 1811 at the mouth of the Russian River. The Russian presence continued at Fort Ross until 1841 when it was sold to John Augustus Sutter.

The Spanish also established missions along California in coastal and near-coastal areas. Junípero Serra founded *Mission San Luis Obispo de Tolosa,* approximately 10 miles east of the JUS S9 Montaña onshore work area, on September 1, 1772 (Padre 2024). In 1817, a mission was built in San Rafael and the San Francisco Solano mission was built in Sonoma in 1823. The focus of these missions was to recruit indigenous people, who the Spanish referred to as "neophytes," and convert them to Catholicism. This conscription of native people was often forceful, and traditional lifeways were often forbidden (Barrett 1908; Hackel 1998).

After the Mexican War of Independence (1810–1822), Mexico won independence from Spain. The newly established Mexican government secularized the missions in Alta California and offered extensive land grants to the citizens of Alta California (Castillo 1978). During this time, the ranching industry fueled the economy with the trade of cattle hides and tallow. Indigenous people were often taken under coercion and enslaved to work on the ranches (Barrett 1908). In 1842, California Governor Alvarado and General Vallejo, who managed Alta California, declared California independent and waged war with Mexico in 1845. The Mexican American War concluded in 1848 with the signing of the Treaty of Guadalupe-Hidalgo, just days before the announcement of the gold discovery at Sutter's Mill (Castillo 1978).

As the Gold Rush picked up steam in 1849, a massive influx of people seeking gold steadily flooded the rural counties of California. The gold fields quickly dried up causing many new arrivals to refocus on other economic opportunities. California held its first constitutional convention in Monterey in September of 1849 resulting in the creation of regional counties in California. Mendocino was designated as one of California's 27 original counties on February 18, 1850, shortly before California officially became a state (Waugh 2003). Humboldt County was formed in 1853 from parts of Trinity County. The new state of California recognized ownership of lands in the state that were distributed under the Mexican Land Grants of the previous decades.

As California experienced exponential growth due to the Gold Rush in the mid-1800s, early settlers to northwestern California found their wealth in lumber. Timber production from old growth redwood trees (*Sequoia sempervirens*) was a critical industry for early historic settlement. Early settlers lived on homesteads, and largely subsisted on their own livestock, gardens, and hunting and fishing yields. Unlike the Russian, Spanish, and Mexican settlers who relied on indigenous people for cheap or forced labor, the American settlers from the east viewed themselves "at war" with native people, although their battles are more accurately described as massacres with the native people showing little resistance while suffering great and unfair losses. For example, dozens of women, children, and elderly were murdered without resistance during U.S. Government-subsidized attacks at Clear Lake and Gunther Island, and hundreds more in other attacks (Castillo 1978).

The Mendocino Reservation, established in 1856 by the Bureau of Indian Affairs, was the first Indian reservation in this area. It was established along the Mendocino coast between the Hare River and Hale Creek, a total length of 11

miles (Barrett 1908). Native people from near and far were brought to this reservation, including those who were formerly enemies. This reservation was abandoned in 1867. The None Cult Indian Farm in Round Valley (later Round Valley reservation) was also established in 1856, which housed Yuki and indigenous people from the Sacramento Valley.

During preparation for World War II, the military initiated several drastic changes along the central coast in response to the perceived Japanese threat from the Pacific. The U.S. Army established large infantry training bases at both Camp Roberts and Camp San Luis Obispo while the Navy established a small base within Morro Bay. The beaches near the JUS S9 Montaña work area became an Army training area comprising roughly 740 acres (Padre 2024). Between 1942 and 1945, the military practiced amphibious landings and assaults on these sand dunes southwest of Cuesta-by-the-Sea. In addition, portions of the hills directly east of the beach were used for an artillery range. Immediately following the war, military activities within this portion of the coastline ceased and the facilities were left unused (Padre 2024).

The end of World War II increased the demand for timber from the north coast to accommodate housing needs for returning soldiers and redwood and Douglas fir from Humboldt and Mendocino Counties provided resources as well as jobs (Carranco and Sorensen 1988). With the growth of the lumber industry came the challenge of moving logs to the mill. Primitive railroads were introduced to the area in 1854 and the railroad network quickly expanded. Additionally, burgeoning sail and steamer commerce developed along the coastline to meet the increased production and transportation demands with various forms of seaside manufacturing and transport facilities constructed. As the road systems improved, ports and landings consolidated through the close of the nineteenth century (Padre 2024).

3.5.1.2 Existing Conditions

Pre-Project Geophysical Surveys from Fiber Optic Cable Installation

Prior to the installation of the JUS S8 and JUS S9 cables, a 1998 geophysical study including bathymetric and sub-bottom profiling, side scan sonar imaging, and diver conducted videos along the cable route was performed (Seafloor Surveys Inc. 1999). The survey comprised a 500-meter-wide corridor surveyed to a maximum depth of 25 meters with 50 meters between survey transects. No shipwrecks were noted in the side scan sonar results, and no man-made

obstacles or previously unrecorded wrecks were encountered within the survey corridor (Seafloor Surveys Inc. 1999).

The search of the CSLC Shipwrecks Database (Appendix E) identified a total of 38 potential shipwrecks in the general vicinity of the JUS S9 Manchester and JUS S8 offshore work area, but review of the pre-project geophysical survey data indicates that only six shipwrecks are situated near the cable alignments (Seafloor Surveys Inc. 1999). Three wrecks are situated 110 meters northeast of the work area (two near JUS S8 and one near JUS S9), one is 115 meters northeast of JUS S8, and the remaining two are over 2.3 kilometers away from both JUS S8 and S9.

Onshore Archaeological and Built Environment Records Search

The California Historical Resources Information System Northwest Information Center (NWIC) in Rohnert Park maintains the California Office of Historic Preservation (OHP) cultural resource records for Mendocino County. The Central California Information Center (CCIC) in Santa Barbara maintains the OHP cultural resource records for San Luis Obispo County. On August 20, 2024, and August 22, 2024, the NWIC and CCIC provided records search results, respectively, for the onshore portion of the Project area and an additional 0.5-mile radius (Appendix E).

Previous Studies

The CCIC records search found that five cultural resources studies have been conducted in the record search radius around the JUS S9 Montaña onshore work area, with three of those encompassing portions of the JUS S9 Montaña work area (Table 3.5-1). One study completed in 1992 (Appendix E) surveyed and assessed the Baywood Park Training Area (BPTA), and the remaining studies were negative within the JUS S9 Montaña work area.

The NWIC records search revealed that a portion of the JUS S9 Manchester and JUS offshore work area has been covered by one previous study, with a total of four studies completed within the 0.5-mile search radius (Table 3.5-1). All of these studies were negative for cultural resources within the JUS S9 Manchester and JUS S8 work area and 0.5-mile search radius.

Table 3.5-1. Previous Studies Within the 0.5-Mile Search Radius of the Project

Study No.	Report Author & Year	Study Title	Location
SL-02106	Peak & Associates, Inc. 1991	A Cultural Resource Assessment of The Proposed HAW-5 Fiber Optic Alignment From San Luis Obispo To Morro Bay, California	San Luis Obispo County
SL-02131	Singer & Atwood 1992	Cultural Resources Survey and Impact Assessment for Part of the Former Baywood Park Training Area, San Luis Obispo County	San Luis Obispo County
SL-03054	Singer 1995	Progress Report on Archaeological Investigations at the former Baywood Park Training Area, Archaeological Site CA-SLO- 1481H, at Montaña De Oro State Park	San Luis Obispo County
SL-03962	Parker 2000	Cultural Resource Resurvey of the Proposed Alignments of the MFS Globenet/Worldcom Fiber Optic Project	San Luis Obispo County
SL-06811	Greenberg 2012	Cultural Resource Inventory of the Western Edge of the Morro Bay Sandspit for the Central California Coastal Seismic Imaging Project	San Luis Obispo County
S-001800	Holman et al., 1969	Archaeological Survey Report of Selected Beaches and Parks from District 2	Mendocino County
S-001800	Origer 1990	An Archaeological Survey for the AT&T Fiber Optics Cable, San Francisco to Point Arena	Mendocino County
S-001800	Jones & Stokes, 2000	Final Cultural Resources Inventory Report for Williams Communications Inc., Fiber Optic Cable System Installation Project, Point Arena to Robbins and Point Arena to Sacramento	Mendocino County

Table 3.5-1. Previous Studies Within the 0.5-Mile Search Radius of the Project

Study No.	Report Author & Year	Study Title	Location
S-001800	McCann 2010	Field Office Report of Cultural Resources Ground Survey Findings, 516-Pipeline, 614-Water Trough, 528-Prescribed Grazing	Mendocino County
S-001800	Thomas and Wills, 2018	Cultural Resources Records Search Results for AT&T Mobility LLC Candidate CCL03978 (Manchester Cable Station), 45001 Kinney Road, Manchester, Mendocino County	Mendocino County

Source: Appendix E.

Previously Recorded Resources

The CCIC records search revealed that the JUS S9 Montaña onshore work area is situated within the boundaries of a known historical-era archaeological site, CA-SLO-1481H (Appendix E). CA-SLO-1481H, also known as the BPTA, was an area leased by the federal government during World War II, which served as an extension of nearby Camp Merriam (later renamed Camp San Luis Obispo). The BPTA functioned primarily as bivouac and maneuver grounds for elements of the U.S. Army's 40th Infantry Division. A small area of the BPTA, nearest the Morro Bay sand spit, was also used by the U.S. Navy and Marine Corps for amphibious vehicle landings (Appendix E). This site was previously evaluated by USACE and determined ineligible for listing on the National Register of Historic Places (NRHP). Three additional pre-contact cultural resources were identified within a 0.5-mile radius of JUS S9 Montaña. The NWIC records search did not identify any cultural resources within the JUS S9 Manchester and JUS S8 offshore work area c or within a 0.5-mile radius of these cables. All resources are listed and described in Table 3.5-2.

Table 3.5-2. Previously Recorded Resources

Primary Site No.	Trinomial Site No.	Description	Eligibility	Location
P-40-000495	CA-SLO-495	Pre-contact shell scatter	Unevaluated	0.5 mile north of APE; San Luis Obispo County

Table 3.5-2. Previously Recorded Resources

Primary Site No.	Trinomial Site No.	Description	Eligibility	Location
P-40-000786	CA-SLO-786	Pre-contact shell scatter	Unevaluated	0.28 mile north of APE; San Luis Obispo County
P-40-001481	CA-SLO-1481H	Baywood Park Training Area	Ineligible	Within APE; San Luis Obispo County
P-40-002014	CA-SLO-2014	Pre-contact shell scatter	Unevaluated	0.46 mile north of APE; San Luis Obispo County

Source: Appendix E.
Notes: APE = area of potential effects.

3.5.2 Regulatory Setting

Federal and state laws and regulations pertaining to cultural resources and relevant to the Project are identified in Appendix A. At the local level, applicable policies and programs are included in Appendix B.

3.5.3 Impact Analysis

a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

No Impact

The proposed Project would not result in any adverse change in the significance of a historical resource because the cultural resources investigation for the Project did not identify any historical resources in the Project area that meet the criteria of significance under CEQA and would be affected by the proposed Project. Therefore, there would be no impact.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less than Significant with Mitigation

While the JUS S9 Montaña onshore work area is within the boundaries of CA-SLO-1481H (Table 3.5-2), the resource has previously been evaluated and determined to be ineligible for listing on the NRHP. In addition, the JUS S9 Montaña onshore work activities would occur entirely within an existing utility

vault and would involve no ground disturbance. No previously recorded cultural resources were identified within the JUS Manchester S9 and JUS S8 offshore work area or within a 0.5-mile search radius. Therefore, the proposed Project would not result in any adverse change to a known archaeological resource.

Project activities in the offshore work areas include DSV operations with a dive team using hand jets to excavate e sediments around the conduit exit points (see *Sections 2.4.3 and 2.5.1, Dive Support Vessel Operations*), with a total area of disturbance of 0.04 acre (1,615 square feet) for JUS S9 Montaña and 0.08 acre (3,288 square feet) for JUS S9 Manchester and JUS S8. These activities would occur over 2,300 feet offshore, and the sediment disturbance would be localized to the conduit exit points and pre-disturbed cable and anchor locations (anchors for JUS S9 Montaña only), with a maximum disturbance depth of 4 feet in the vicinity of the anchors. Due to the excavations being localized, the sedimentary processes occurring offshore at a distance and water depth (33 to 36 feet) that would constantly erode, bury, and shift sediments over time; and previous disturbance around the conduit exit points, the impact to archaeological resources from dive team activities would be less than significant.

Offshore marine vessels would also require large or frequent anchoring, which could impact potential shipwrecks located in the vicinity of the cable route (see *Section 3.5.1.2*). However, **MM CUL-1** would require preparation of an avoidance plan, as part of the Marine Safety and Anchoring Plan (**MM BIO-6**), that would incorporate the data from previous geophysical surveys in order to avoid any identified seafloor anomalies during marine vessel anchoring in the JUS S9 Manchester and JUS S8 offshore work area. With implementation of this measure, the impact would be less than significant.

MM CUL-1: Prepare and Implement an Avoidance Plan for Marine Archaeological Resources. The Applicant or their designee shall incorporate an Avoidance Plan into the Marine Safety and Anchoring Plan (MM BIO-6) to avoid all identified shipwrecks or seafloor anomalies identified in the pre-project geophysical study (Seafloor Surveys, Inc. 1999), which was conducted prior to the JUS S8 and JUS S9 cable installations.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant with Mitigation

No human remains are known to be in or near the JUS S9 Montaña or JUS S9 Manchester and JUS S8 work areas. Similar to the discussion regarding previously unknown archaeological resources (see (b), above), the likelihood of disturbance of human remains around the conduit exits is low due to the relatively small area, shallow depths of excavation, and the sedimentary processes occurring offshore at a distance (between approximately 2,300 to 2,600 feet for both offshore work areas) and water depth (33 to 36 feet) that would constantly erode, bury, and shift sediments over time. However, the possibility always exists that unmarked burials may be unearthed during ground disturbing activities in the offshore work areas. **MM CUL-2** would ensure that, if any discovery is made by the dive team during offshore excavation activities, further disturbance would halt until the human remains had been appropriately assessed and treatment, if necessary, approved. With implementation of this measure, the impact would be less than significant.

MM CUL-2: Unanticipated Discovery of Human Remains. If human remains are encountered, all provisions provided in California Health and Safety Code section 7050.5 and California Public Resources Code section 5097.98 shall be followed. Work shall stop within 100 feet of the discovery, and both an archaeologist and CSLC staff must be contacted within 24 hours. The archaeologist shall consult with the County Coroner. If human remains are of Native American origin, the County Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours of this determination, and a Most Likely Descendent shall be identified. No work is to proceed in the discovery area until consultation is complete and procedures to avoid or recover the remains have been implemented.

3.5.4 Mitigation Summary

Implementation of the following mitigation measures would reduce the potential for Project-related impacts to cultural resources to less than significant.

- **MM CUL-1: Prepare and Implement an Avoidance Plan for Marine Archaeological Resources**
- **MM CUL-2: Unanticipated Discovery of Human Remains**

3.6 CULTURAL RESOURCES – TRIBAL

TRIBAL CULTURAL RESOURCES - Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1, subdivision (k), or	☐	☒	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to	☐	☒	☐	☐

TRIBAL CULTURAL RESOURCES - Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a California Native American tribe.				

3.6.1 Environmental Setting

3.6.1.1 Ethnographic Context

JUS S9 Montaña – San Luis Obispo County

California has a long history of human occupation. Despite scattered claims of earlier presence, the most conservative estimate is that people began traveling from northeastern Asia to North America and inhabiting its vast and varied geography near the end of the Pleistocene. Previously, scholars believed that this slow migration occurred solely through terrestrial journeys inland via the Bering Strait between modern-day Russia and the US state of Alaska. However, evidence of maritime exploration during that similar timeframe has come to light through dated coastal sites along the Pacific coast of the Americas, even without the discovery of any maritime vessel in the archaeological record (Erlandson et al. 2007). Table 3.6-1 presents chronology for the California central coast.

Table 3.6-1. California Central Coast Chronology

Temporal Period	Date Range
Paleo-Indian	Pre-9950 BP
Milling stone	9950–5450 BP

Table 3.6-1. California Central Coast Chronology

Temporal Period	Date Range
Early	5450–2550 BP
Middle	2550–950 BP
Middle-Late Transition	950–700 BP
Late	700–181 BP

Source: Jones et al. 2007.
Notes: BP = before present ("present" is 1950 AD.).

Paleo-Indian Period

Lifeways of indigenous groups living within San Luis Obispo County followed general patterns identified in the archaeological record of the greater central coast region of California (Jones et al. 2007; Milliken 1995). These patterns represent adaptive shifts in settlement, subsistence strategies, and technological innovation over time. Evidence of human habitation during the *Paleo-Indian Period* (10,000 years ago and older) is not common and generally expressed through isolated flaked stone artifacts or sparse lithic scatters. Fluted projectile points, which characterize this period in other parts of western North America, including within San Luis Obispo County (Bertrando 2004; Gibson 1996; Mills et al. 2005). Another distinctive flaked stone tool associated with this period, however, the eccentric crescent, was discovered at a site in Scotts Valley, which is situated on the shoreline of a former Pleistocene Lake, providing compelling evidence of Paleo-Indian habitation there (Cartier 1993; Erlandson 2011). Although there are no known coastal sites dating to this time period, they may have been inundated by rising ocean levels throughout the Holocene (Jones and Jones 1992).

Milling Stone Period

Human settlement in San Luis Obispo County appears more frequently during the *Milling Stone Period* (5,500 to10,000 years ago). Sites dating to this period are found along creeks, estuaries and coastlines and contain both flaked and ground stone artifacts as well as rectangular shell beads (Fitzgerald and Jones 1999; Hylkema 1991; Jones and Hildebrandt 1990; Jones and Hildebrandt 1994; Newsome et al. 2004). The emergence of ground stone tools, such as milling stones and hand stones, suggest a greater reliance on plant resources whereas flaked stone tools are less common. The projectile points found on sites of this antiquity are generally leaf-shaped or large side-notched varieties, although

other flaked stone tools, such as core-cobble tools, were also used (Jones et al. 2007). Subsistence is heavily reliant on marine resources and small mammal bones, although terrestrial game, such as deer, were also on the menu (Jones et al. 2008; Newsome et al. 2004). The presence of thick rectangular *Olivella* beads indicate the emergence of exchange networks with neighboring populations.

Early Period

During the *Early Period* (2,600 to 5,500 years ago) sites are found in more varied geographical landforms than previously, suggesting a more intensive use of the landscape (Jones and Waugh 1995). The shift in site locations and artifact assemblages during this time may represent adaptive shifts or an intrusion of neighboring populations as a result of mid-Holocene climate warming trends (cf. Mikkelsen et al. 2000). The initial use of mortars and pestles during this time reflects a more labor-intensive economy associated with the adoption of acorn processing (cf. Basgall 1987). Similarly, a greater percentage and variety of formalized flaked stone tools, including side-notched, square-stemmed, and contracting-stemmed projectile points indicate a greater reliance on terrestrial hunting. Diversity of *Olivella* bead types also emerge as well as bone tools such as gorges.

Middle Period

During the *Middle Period* (950 to 2,600 years ago), there was a shift toward more long-term occupation at sites, as well as a greater quantity of smaller "use-specific" localities, such as resource processing or tool manufacturing areas. There is also evidence of a shift toward prey species that are more labor intensive to capture, including small schooling fishes, sea otters, and rabbits. Artifacts common to this period include contracting-stemmed projectile points, a greater variety of *Olivella* shell beads and *Haliotis* ornaments, and bone tools and ornaments (Jones 2003). Circular shell fishhooks and grooved stone net weight sinkers are present for the first time, signaling a continued importance on marine resources (Jones and Ferneau 2002a; Jones and Waugh 1995). Similarly, mortars and pestles are more prevalent than milling stones and hand stones showing the continued importance of plant resources, such as acorns (Jones et al. 2007).

Middle-Late Transition Period

The *Middle-Late Transition* (700 to 950 years ago) corresponds with a period of rapid climatic change and social reorganization across the region. The Medieval Climatic Anomaly (cf. Stine 1994), characterized by fluctuations

between cool-wet and warm-dry conditions, was likely an impetus for the cultural change (Jones et al. 1999). Archaeological sites dating from this period are rarer, which may reflect a decline in regional population (Jones and Ferneau 2002b). Artifacts associated with the Middle-Late Transition include contracting-stemmed, double-side-notched, and small leaf-shaped projectile points. The latter are thought to represent the introduction of bow and arrow technology to the region. A greater variety of *Olivella* shell bead types are found on sites from this Period, as are notched line sinkers, hopper mortars, and circular shell fishhooks (Jones and Waugh 1995; Jones et al. 2007).

Late Period

Sites dating to the *Late Period* (700–181 years ago) are found in a variety of contexts, both coastal and interior. Specialized sites devoted to resource acquisition or processing (such as shellfish gathering areas or bedrock milling stations) are common on the coast, whereas residential occupation is more common inland (Fitzgerald and Ruby 1997; Jones et al. 2007). Artifacts associated with this period include arrow points with the development of bow and arrow technology, flaked stone drills, steatite and clamshell disc beads, *Haliotis* disc beads, and *Olivella* beads. Other artifacts such as milling stones, hand stones, mortars, pestles, and circular shell fishhooks continue to be used (Jones et al. 2007).

Ethnographic Context

Ethnographically, the JUS S9 Montaña onshore work area lies within the traditional homelands of the Northern Chumash, or Obispeño, whose descendants continue to live in the region today, maintaining vibrant cultural practices and community presence. Milliken and Johnson (2005) identify the village of *Petpatsu* in Montaña de Oro State Park in the Islay Creek drainage, although evidence for the village is limited (FWARG 2016: 42). Milliken (2000: 13) notes that the Northern Chumash may have had more in common with their central coast neighbors (the Salinan) than with their linguistic relatives who lived along the Santa Barbara Channel. The Far Western Anthropological Research Group (2016: 30–43) provides a detailed description of primary and secondary ethnographic sources for the greater Northern Chumash area; however, many of these are biased toward discussions of groups living along the Santa Barbara Channel and therefore provide an incomplete picture of Northern Chumash life. Greenwood (1978) provides an overview of the Obispeño and Purisimeño Chumash, the latter residing to the south, near Points Arguello and Conception.

Traditional residences were generally round and may have been occupied by one or more families. Northern Chumash may have practiced seasonal mobility and lived in smaller groups, as large, permanent villages were not described by early explorers. The plank canoe, such as the tomol, a hallmark of the Chumash residing in the Santa Barbara channel, was unlikely to have been commonly manufactured or used north of Point Conception. Water going craft, such as tule balsas, were noted in San Luis Obispo Bay in 1595 (Greenwood 1978: 521). The Northern Chumash traditionally made use of both marine and terrestrial environments, fishing with shell hooks and nets, and hunting with bows and arrows and spears. Milling stones, mortars, pestles, and cobble tools were used to process plant and animal resources, including mollusks.

Wagner (1929) describes cordage bags, flat basketry trays, and wooden grinding troughs as being used as well. Beads were used as inlays on stone vessels, bone whistles, and baskets, among other items. Disc beads were often made of clam and mussel. Other items included charmstones, quartz crystals, and wooden flutes.

The Northern Chumash traded asphaltum (a tar-like substance) and marine shells with the Yokuts to the east and shell beads, dried fish, and sea otter furs with the Salinan to the north and east.

Today, Northern Chumash descendants continue to steward cultural knowledge, land-based practices, and community traditions, underscoring the enduring presence and resilience of Chumash people on the Central Coast.

JUS S9 Manchester and JUS S8 – Mendocino County

Humboldt and Mendocino Counties have a long history of occupation and use by Native American groups. The Russian and Eel Rivers and other watercourses, valleys, and coastal areas provided a rich and varied habitat for Native Americans who have occupied the area for upwards of 10,000 years since the Pleistocene/Holocene Transition. Archaeologists have defined six broad patterns within Native American occupation in Northwestern California.

The Post Pattern (10,000 Before Present [BP] or Earlier)

The Post Pattern represents the earliest occupation of the area. This pattern is characterized by fluted (Clovis-like), concave-base projectile points and crescents. So far, the fluted points have only been found at the Borax Lake site (CA-LAK-36) in Lake County and at a coastal site in Mendocino County. Crescent tools have been found at Borax Lake (CA-LAK-36) as well as in Sonoma

County. Early obsidian hydration readings have been made at sites in the Clear Lake basin and at Cache Creek (Fredrickson and Origer 2002; White et al. 2002; DeGeorgey 2004). Unfortunately, all of the artifacts associated with the Post Pattern are either in isolated contexts or are associated with sites lacking well-dated stratigraphy, so little is currently known about the region's earliest human inhabitants, other than one of their subsistence strategies during this time involved hunting.

The Borax Lake Pattern (10,000 BP to 5000 BP)

The Borax Lake Pattern is characterized by a wider variety of flaked stone tools and ground stone found in more diverse settings. Stone tools used in this time period include large wide-stemmed projectile points with indented bases, serrated bifaces, ovoid flake tools, hand stones, and milling stones. Sites representing this pattern are generally found on ridgetops and river terraces, with one of the oldest known house floors found at ridgetop site CA-HUM-573, which produced a radiocarbon date of approximately 8000 BP (Fitzgerald and Hildebrandt 2002). People living during this time exhibited a forager approach to subsistence, moving frequently to take advantage of resources.

The Mendocino Pattern (5000 BP to 1450 BP)

The Mendocino Pattern, initiating approximately 5,000 years ago, is characterized by a stylistic change in projectile points that now include side-notched points, corner-notched points, and concave-base dart points (Willits and Mendocino series). Hand stones and milling stones continue to be the dominant ground stone tools, although cobble mortars and pestles first make their appearance during this time. Sites are found along the coastline, as well as mountainous areas. Some regional variations began to emerge, such as the presence of unifaces north of what is now Sonoma County, and leaf-shaped dart points in the southern areas. Most of the sites dating to this time period represent temporary hunting camps or short-term residential camps.

The Berkeley Pattern (8500 BP to 1150 BP)

The Berkeley Pattern was concurrent with the Mendocino Pattern and is only associated with areas from central Mendocino County and south; it is not evident north of central Mendocino County. While the Berkeley Pattern first appears in the Clear Lake area between 8500 BP and 6300 BP (Mostin Phase), the elements that characterize this time period were not evident again until approximately 3200 BP to 1150 BP. The artifact assemblage reflecting this pattern is diverse, and includes leaf-shaped (Excelsior) points, stemmed points, bone

tools, fishing tools (spears, harpoons, hooks, net sinkers), and clay artifacts (including some pottery). The ground stone assemblage is dominated by mortars and pestles. Impressions of basketry on baked clay show a diverse range of styles and forms. Residential sites appear more sedentary with well-developed midden soil, house floors, and other features. Subsistence was based on acorn, terrestrial game, and fish. It appears that people expressing Berkeley Pattern culture and those expressing Mendocino Pattern culture co-existed, with the Berkeley Pattern people controlling access to fish resources, but trading or allowing use to the more mobile Mendocino Pattern people. Trade relationships are also evident between the two groups (White et al. 2002). Starting from approximately 1450 BP, a western expansion of Berkeley Pattern culture appears from the Clear Lake area to the Sonoma County coast. Researchers attribute this to Pomoan expansion, replacing Yukian-speaking populations who formerly occupied those areas (Basgall 1982; Baumhoff 1980; Fredrickson 1984; Golla 2007; White et al. 2002).

Tuluwat (Formerly Gunther) Pattern (Post-1450 BP)

The Tuluwat Pattern represents cultural change north of Central Mendocino County (where the Berkeley Pattern did not extend) as evidenced by a greater degree of sedentism, particularly on the northern coast where offshore rocks and islands exhibit a high quantity of Gunther-barbed projectile points and concave projectile points used for harpooning marine mammals and fish. Other artifacts unique to this pattern include ground and polished stone artifacts, some with extensive decoration, flanged pestles, mauls, net sinkers, steatite bowls, zoöform clubs, bone and antler spears, harpoons, and fishhooks (Bennyhoff 1950). People expressing the Gunther Pattern focused on marine resources, as evidenced by their tool assemblage as well as the faunal assemblages, which are strong in sea mammals and fish (Hildebrandt 1984). North coast residential sites are complex with well-defined house areas, cemeteries, artifact caches, and midden. Ceremonial items such as zoöform clubs, dentalia, and large obsidian blades, which are noted ethnographically in the White Deerskin dance, appear in burial contexts for a limited number of people, suggesting similar social stratification as indicated in ethnographic accounts during historical-period contact (Hildebrandt and Levulett 2002). The Gunther Pattern likely relates to the arrival of Algic speaking people such as the Wiyot and the Yurok, and Athabaskan speakers who settled the area. South of Cape Mendocino, coastal expressions of this pattern are rare, and Gunther-

barbed projectile points are found inland within communities relying on terrestrial and littoral resources instead of marine resources.

The Augustine Pattern (Post-1450 BP)

The Augustine Pattern occurred simultaneous to the Gunther Pattern in the southern part of the Project vicinity. Centered in the Sacramento-San Joaquin Delta area, this pattern extends to approximately the border between Sonoma and Mendocino Counties. This pattern is represented by the introduction of bow and arrow technology, reliance on acorns as a staple food resource, and use of fish harpoons. The artifact assemblage is made up of rattlesnake corner-notched projectile points Olivella and clamshell beads, "banjo" shaped Haliotis ornaments, bird bone whistles, and flanged steatite pipes. Both hand stone/milling slab and mortar/pestle ground stone technology were used. Cremation in mortuary practices is common (Bennyhoff 1994). A high degree of variability in settlement patterns is expressed, from centralized villages on ridgelines to short-term occupations in coastal areas, as well as occupation in habitats not previously used.

Ethnographic Context

The JUS S9 Manchester and JUS S8 work area lies within the traditional territory of the Western Pomo (Bean and Theodoratus 1978), whose descendants continue to live, and maintain vibrant cultural traditions in the region today. As discussed by Bean and Theodoratus (1978), the Western Pomo represent one branch of the larger and diverse Pomo language family (McLendon and Oswalt 1978); however, the concept of a "Pomo" group is more of a European construct due to the cultural and linguistic variability observed among people who spoke languages within the Pomo language family (Gifford and Kroeber 1939: 119). Within this broader diversity, the Western Pomo are traditionally divided into Northern, Central, Southern, and Kashaya groups. The Project vicinity is within the area historically associated with the Western Central Pomo. However, these categories are broad generalizations and do not reflect the full cultural variability or the ongoing identities of contemporary Pomo peoples.

The principal historical village of the Central Pomo was located at the mouth of Garcia River, near Point Arena, south of the Project area (McLendon and Oswalt 1978: 281). Central Pomo communities traditionally organized themselves into semi-autonomous tribelets with strong ties among kin groups. Residential structures were commonly single-family conical dwellings built of redwood bark

slabs. Multi-family communal structures were more common with inland populations (Bean and Theodoratus 1978: 292).

Hunting and gathering comprised the primary subsistence activities of the Pomo, who gathered and processed acorns, buckeye, grasses, roots, bulbs, edible greens, seaweed, and kelp. Game was hunted individually and communally and included deer, elk, antelope, rabbits, squirrels, birds, freshwater and marine fish, as well as grasshoppers and caterpillars (Bean and Theodoratus 1978: 290). Hunting and food processing tools included bow and arrow, heavy spear, clubs, spears, bola, nets, snares, fishhooks, stone mortars and pestles, and basketry traps. The Pomo are world-renowned for their exceptional basketry, employing coiled, twined, and wicker techniques.

Today, Pomo communities remain active stewards of their ancestral lands and cultural heritage, continuing to revitalize language, basketry, ecological knowledge, and community leadership across their homelands.

3.6.1.2 Tribal Coordination

Assembly Bill (AB) 52 (Gatto, Chapter 532, Statutes of 2014) amended CEQA to specify that a project that may cause a substantial adverse change in the significance of a "tribal cultural resource" is a project that may have a significant effect on the environment and that tribal knowledge about land and resources should be included in environmental assessments.

The AB 52 process requires the CEQA lead agency to consult with traditionally and culturally affiliated California Native American tribes with the geographic area of the proposed Project, upon request. Draft CEQA documents cannot be released for public review before the tribe(s) has had the opportunity to request consultation and, if requested, for consultation to be completed, including agreeing to acceptable mitigation measures.

Supplementing AB 52 and pursuant to Executive Order B-10-11 concerning coordination with tribal governments in public decision making (Appendix A), the CSLC adopted a Tribal Consultation Policy in August 2016 to provide guidance and consistency in its interactions with California Native American tribes (CSLC 2016). The Tribal Consultation Policy, which was developed in collaboration with tribes, other state agencies and departments, and the Governor's Tribal Advisor, recognizes that tribes have a connection to areas that may be affected by CSLC actions and "that these Tribes and their members

have unique and valuable knowledge and practices for conserving and using these resources sustainably" (CSLC 2016).

Under AB 52, lead agencies must avoid damaging effects on Tribal Cultural Resources, when feasible, whether consultation occurred or is required. When considering whether a resource is a Tribal Cultural Resource and determining the significance of potential impacts, the CSLC may consider, among other evidence, elder testimony, oral history, tribal archival information, testimony of an archaeologist or other expert certified by the tribe, official declarations or resolutions adopted by the tribe, formal statements by the tribe's historic preservation officer, or other historical notes and anthropological records.

The CSLC contacted the Native American Heritage Commission (NAHC), which maintains two databases to assist specialists in identifying cultural resources of concern to California Native Americans (Sacred Lands File and Native American Contacts). A request was sent to the NAHC for a Sacred Lands File search of the Project area and a list of Native American representatives who may be able to provide information about resources of concern located within or adjacent to the Project area.

On November 10, 2025, the NAHC responded stating that the Sacred Lands File database included previously identified sacred sites in the Project area for Mendocino County and to contact the Manchester Band of Pomo Indians of the Manchester Rancheria for more information. The NAHC also provided a list of 29 additional tribal contacts from 19 Native American tribes. The Sacred Lands File database for San Luis Obispo County also identified sacred sites in the Project area. A list of 12 tribal contacts from six Native American tribes was provided, which the CSLC used for outreach and engagement.

On January 9, 2026, the CSLC sent Project notification letters to the tribes on the NAHC contact list to provide an opportunity for meaningful input on the potential for Tribal Cultural Resources to be found in the proposed Project area and recommend steps to be taken to ensure adverse impacts to Tribal Cultural Resources are avoided. The outreach letters sent in January 2026 included chairpersons and representatives of the following tribes:

Mendocino County

- Big Valley Band of Pomo Indians of the Big Valley Rancheria
- Cahto Tribe
- Cloverdale Rancheria of Pomo Indians

- Coyote Valley Band of Pomo Indians
- Dry Creek Rancheria of Pomo Indians
- Elem Indian Colony Pomo Tribe
- Estom Yumeka Maidu Tribe of the Enterprise Rancheria
- Guidiville Rancheria of California
- Hopland Band of Pomo Indians
- Koi Nation of Northern California
- Manchester Band of Pomo Indians of the Manchester Rancheria
- Middletown Rancheria of Pomo Indians
- Noyo River Indian Community
- Pinoleville Pomo Nation
- Potter Valley Tribe
- Redwood Valley or Little River Band of Pomo Indians
- Robinson Rancheria of Pomo Indians
- Round Valley Reservation/Covelo Indian Community
- Scotts Valley Band of Pomo
- Yokayo Tribe

San Luis Obispo County

- Coastal Band of the Chumash Nation
- Northern Chumash Tribal Council
- Salinan Tribe of Monterey, San Luis Obispo Counties
- Santa Ynez Band of Chumash Indians
- Tule River Indian Tribe
- yak tityu tityu yak tiłhini – Northern Chumash Tribe

CSLC received a response to the outreach letters from the yak tityu tityu yak tiłhini – Northern Chumash Tribe (ytt Tribe) requesting information about the type

of equipment and staging that would be needed. The ytt Tribe indicated the Montaña de Oro State Park area is highly culturally and environmentally sensitive. Staff provided an excerpt from the project description outlining the onshore activities. Staff met with the tribe to discuss the planned onshore and offshore activities. During the meeting, the tribe requested that divers receive training by an archaeologist on how to identify cultural items, Tribal Cultural Resources, or human remains. The tribe indicated they could support the training but preferred that an archaeologist lead the session using replica artifacts.

The Northern Chumash Tribal Council requested formal consultation on the proposed Project. Staff met with the tribe to discuss the planned onshore and offshore activities. Following this discussion, the tribe expressed concurrence with the Project moving forward. The tribe requested to be notified at the start and completion of onshore Project implementation.

The Salinan Tribe of Monterey, San Luis Obispo Counties also responded to the outreach letter and noted that this area of the Central Coast is sacred to their people. They requested tribal monitors and a copy of the cultural report prepared for the Project. Staff provided a copy of the Marine Archeological and Cultural Resources Study for review. After reviewing the study, the tribe informed staff that they had no concerns with the Project and no longer requested monitors. They asked to be notified if any future Project changes would involve onshore ground disturbance.

3.6.2 Regulatory Setting

Federal and state laws and regulations pertaining to Tribal cultural resources and relevant to the Project are identified in Appendix A. At the local level, applicable policies and programs are included in Appendix B.

3.6.3 Impact Analysis

Would the project cause a substantial adverse change in the significance of a Tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources (CRHR), or in a local register of historical resources as defined in Public Resources Code section 5020.1, subdivision (k), or

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less than Significant with Mitigation

The results from a records search of the NAHC's Sacred Lands Files did indicate the presence of Native American cultural resources within the Project work areas (identified as within a U.S. Geological Survey quadrangle boundary) in San Luis Obispo and Mendocino counties. However, the JUS S9 Montaña work area is approximately 21 miles north of the Chumash Heritage National Marine Sanctuary. Project work activities would not occur within the sanctuary. However, the proposed decommissioning activities could impact previously unrecorded Tribal Cultural Resources. Potential discoveries during DSV operations, specifically when the dive team would use hand jets to excavate sediments around the conduit exit points, could unearth historical or archaeological resources that are Native American in nature or could consist of Tribal Cultural Resources associated with Native American history, culture, and habitation. A Tribal Cultural Resource may or may not also be considered an archaeological or historical resource. **MM TCR-1** would ensure that in the event of an accidental discovery, further disturbance would halt until the resource had been appropriately assessed and treated, if necessary. With implementation of this measure, the impact would be less than significant.

MM TCR-1: Tribal Cultural Awareness Training. Prior to or concurrent with Dive Support Vessel (DSV) mobilization within the JUS S9 Montaña offshore work area, the Applicant's DSV contractor and divers shall participate in a tribal cultural resources awareness training program developed by a qualified archaeologist familiar with the cultural resources that may be found offshore of San Luis Obispo County. If requested by a consulting Native American tribe within 30 days following CSLC's approval of the Project, the Applicant shall notify CSLC of the request and accommodate the tribe's participation in the development of the

training program materials, tribal concurrence/approval of the training program materials, and/or tribal participation in the training session. The Applicant shall submit the training program materials to CSLC no later than 30 days prior to conduit excavation activities.

The training will be conducted by a qualified archaeologist, and, if timely requested by a consulting Native American tribe, the tribe may have a Tribal Representative(s) participate at the training. Subsequent training sessions would be required to accommodate any new personnel that participate in conduit excavation activities.

The purpose of the training will be to educate DSV personnel as to the sensitivity of tribal cultural resources in the project area, including the possibility of exposing tribal cultural resources, guidance on recognizing such resources, and direction on work stoppage if a potential resource is encountered. The program will also underscore the requirement for confidentiality and culturally appropriate treatment of any find of significance to Native Americans, consistent with Native American tribal values and customs.

The training shall include, at a minimum:

- A brief overview of the cultural sensitivity of the Project site and surrounding area;
- What resources could potentially be identified during excavation around the conduit exit point;
- The protocols that apply in the event unanticipated tribal cultural resources are identified, including the requirement to stop work and communicate the potential discovery to CSLC; and,
- Consequences (including, but not limited to, cultural, legal, and regulatory consequences) in the event of noncompliance.

If a potential tribal cultural resource is encountered, DSV diver excavation activities shall halt and CSLC will be immediately notified. Excavation activities shall not continue until the find(s) can be properly evaluated in consultation with CSLC staff and any participating Tribes. Evidence of compliance with the training requirements of this mitigation measure shall be documented within pre-Project

compliance documentation materials prior to commencement of marine activities in the JUS S9 Montaña offshore work area and submitted to CSLC upon completion of the training.

3.6.4 Mitigation Summary

Implementation of the following mitigation measures would reduce the potential for Project-related impacts on Tribal Cultural Resources to less than significant.

- **MM TCR-1: Tribal Cultural Awareness Training**

3.7 ENERGY

ENERGY - Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

3.7.1 Environmental Setting

California relies on a regional power system composed of a diverse mix of natural gas, petroleum, renewable, hydroelectric, and nuclear generation resources. However, as petroleum would be the only energy source that is anticipated to be consumed by the Project, it is the only source discussed within this energy analysis.

According to the U.S. Energy Information Administration, California used approximately 648 million barrels of petroleum in 2023, with the majority (555 million barrels) used for the transportation sector (EIA 2025). There are 42 U.S. gallons in a barrel, so this equates to a total daily use of approximately 15.4 million gallons of petroleum among all sectors and 13.2 million gallons for the transportation sector. In California, petroleum fuels refined from crude oil are the dominant source of energy for transportation sources. Petroleum usage in California includes petroleum products such as motor gasoline, distillate fuel, liquefied petroleum gases, and jet fuel.

3.7.2 Regulatory Setting

Federal and state laws and regulations pertaining to energy and relevant to the Project are identified in Appendix A. At the local level, applicable policies and programs are included in Appendix B.

3.7.3 Impact Analysis

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact

The Project, scheduled for July 2026 through September 2026, would have short-term construction fuel use with the Project activities and sequencing designed to avoid vessel idling and associated wasteful fuel consumption. Energy consumption during Project work activities would be necessary, minimized, and aligned with industry standards, without waste or inefficiency. Natural gas is not expected to be used.

Project work activities would involve petroleum-fueled equipment, such as marine vessels and heavy duty equipment and generators on the marine vessels, which are usually diesel powered, as well as on-road vehicles, which are usually gasoline powered. Gasoline-powered pickup and utility trucks would be used for worker and equipment transportation to the JUS S9 Montaña onshore area. Contractors would be required to comply with applicable CARB regulations regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Compliance with existing anti-idling and emissions regulations would result in a more efficient use of energy and would minimize or eliminate wasteful or unnecessary energy consumption. The construction activities would not draw electricity from the local grid except for minimal potential use for hand tools. Therefore, the impact would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact

As discussed in a), above, the Project would not result in wasteful, inefficient, and unnecessary consumption of energy. Energy use during Project activities would be temporary and sequenced to avoid vessel idling and associated wasteful fuel consumption, thus minimizing energy use. The Project's energy consumption would not conflict with or obstruct any state or local plans for renewable energy or energy efficiency, including the County of San Luis Obispo EnergyWise Plan and County of San Luis Obispo EnergyWise Plan 2016 Update. Therefore, there would be no impact.

3.7.4 Mitigation Summary

The Project would have no significant impact to energy; therefore, no mitigation is required.

3.8 GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES

GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES - Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐

GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES - Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

3.8.1 Environmental Setting

3.8.1.1 Regional Geology

The Project is located within the Coast Ranges Geomorphic Province, which consists of northwest-trending, generally 2,000- to 6,000-foot-high mountain ranges and valleys. The Coast Ranges are located between the Great Valley Geomorphic Province to the east and the Pacific Ocean to the west. The Coast Ranges are subparallel to the San Andreas Fault, which extends more than 600 miles from Point Arena on the north to the Gulf of California on the south. West of the San Andreas Fault is the Salinian Block, which includes the JUS S9 Montaña work area, and which consists of a granitic core extending from the southern extremity of the Coast Ranges to north of the Farallon Islands. The northern and southern Coast Ranges are separated by a depression containing the San Francisco Bay. The JUS S9 Montaña work area is located in the southern ranges. The JUS S9 Manchester and JUS S8 work areas are located within the northern ranges, which are dominated by irregular, knobby, landslide

topography of the Franciscan Complex (CGS 2002). The coastline of the Coast Ranges is uplifted and characterized by marine terraces and wave-cut platforms (CGS 2002).

3.8.1.2 JUS S9 Montaña – San Luis Obispo County

Stratigraphy

The onshore work area is located on Quaternary eolian dune and beach sand deposits, which generally consist of coarse-grained, unconsolidated sand deposits (USGS 2017; Dibblee 2006). The dune deposits in the vicinity of the onshore work area have been stabilized by perennial vegetation. The nearest rock outcrops on the shoreline are approximately 0.5 mile (0.8 kilometer) south of the Sandspit parking lot. Rocky shoreline predominates beginning at Islay Creek and continuing southward around Point Buchon (Padre 2024).

The seafloor of the offshore work area near Montaña de Oro State Park has been characterized by soft sandy patches mixed with rocky outcrops, pebbles, and boulders, which increase in number with distance away from shore (Figure 2-4). Sedimentary rock outcrops are numerous and are mapped past California's offshore boundary, up to 7 miles offshore. The rocks are folded and faulted due to movement along the Los Osos and Hosgri Fault Zones (Padre 2024).

Seismicity and Faulting

The JUS S9 Montaña work area is located in a seismically active area, with numerous active (movement in the last 11,700 years) and potentially active (movement in the last 1.6 million years) faults located in the region. A potentially active segment of the Los Osos Fault is located in the vicinity of both the onshore and offshore work areas. An active segment of this fault is located approximately 8 miles east of the onshore work area, near the City of San Luis Obispo. The west-northwest-trending Los Osos Fault terminates offshore at its western end at the northwest-trending, active Hosgri Fault Zone, located approximately 5 miles west of the onshore work area (CGS 2025a). This major fault zone has a probable maximum moment magnitude of 6.5 to 7.5 (Southern California Earthquake Data Center 2025). Other potentially active faults located within 10 miles of the onshore and offshore work areas include the Edna, San Miguelito, and Cambria Faults (CGS 2025a). In addition, the active Shoreline Fault, the location of which is inferred based on seismicity, is located

approximately 3 miles southwest of the onshore and offshore work areas (Pacific Gas and Electric 2011).

Topography and Bathymetry

The onshore work area is located on a relatively flat, paved parking lot. Based on Google Earth images, the bathymetry in the offshore work area is gently sloping as it traverses the continental shelf, and the continental slope steepens beyond California's offshore boundary (approximately 3 nm).

Paleontological Resources

Paleontological resources are the remains or traces of plants and animals that are preserved in the Earth's crust and are older than written history or older than approximately 5,000 years, which approximates the middle Holocene of Cohen et al. (2024) (SVP 2010). They are limited, nonrenewable resources of scientific and educational value and are afforded protection under state laws and regulations.

According to geologic mapping by Wiegers (2009) at a 1:24,000 scale and the geologic timescale of Cohen et al. (2024), the JUS S9 Montaña onshore work area in the Sandspit parking lot is underlain by late to middle Pleistocene (11,700 to 774,000 years ago) old eolian deposits (map unit Qoe). This unit is comprised of old stabilized sand dunes of brown, moderately consolidated, well sorted windblown sands (Wiegers 2009). This unit would have high paleontological sensitivity.

A literature search produced the following closest known fossil localities to the JUS S9 Montaña onshore work area: approximately 5.5 miles northeast, locality California Polytechnic State University San Luis Obispo vertebrate paleontology 7001/Natural History Museum of Los Angeles County (LACM) 5903 produced an American Mastodon from either late Pleistocene to early Holocene young alluvium or the underlying late to middle Pleistocene old alluvial floodplain deposits (Jefferson et al. 1992; PBDB 2025); and approximately 5 miles south, locality LACM 4523/LACM invertebrate paleontology 5640/U.S. Geological Survey, Denver M7280 yielded fish and unidentified mammal fossils from late to middle Pleistocene old paralic deposits (Jefferson et al. 1992; PBDB 2025).

3.8.1.3 JUS S9 Manchester and JUS S8 – Mendocino County

Stratigraphy

In the offshore work area, the seafloor is characterized by sand close to shore, then occasional rocky outcrops and harder substrate along the cable alignments farther offshore. Near-surface sediments along JUS S9 Manchester and JUS S8 cable alignments generally consist of coarse-grained sand near the coastline and sediment sizes decreasing with distance from shore to finer sands, silts, and then a predominance of clays (Padre 2024).

Seismicity and Faulting

The offshore work area is located in a seismically active region. An offshore section of the San Andreas Fault that ruptured in 1906 may intersect the JUS S8 work area within the California offshore boundary (approximately 3 nm) (CGS 2025a). The San Andreas Fault has a probable maximum moment magnitude of 6.8 to 8.0 (Southern California Earthquake Data Center 2025). In addition, the potentially active Hathaway Creek Fault is located approximately 4 miles south-southeast of the conduit exit points in the offshore work area (CGS 2025a).

Bathymetry

The bathymetry across the continental shelf for the JUS S9 Manchester and JUS S8 cable alignments is relatively smooth and gradual, with an average west-northwest slope gradient for the JUS S8 cable alignment (Padre 2024).

3.8.2 Regulatory Setting

Federal and state laws and regulations pertaining to geology, soils, and paleontological resources and relevant to the Project are identified in Appendix A. At the local level, applicable policies and programs are included in Appendix B.

3.8.3 Impact Analysis

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii) Strong seismic ground shaking?

iii) Seismic-related ground failure, including liquefaction?

No Impact

JUS S9 Montaña and JUS S9 Manchester and JUS S8 are located in seismically active regions of central and northern California, respectively (see Sections 3.8.1.2 and 3.8.1.3). A potentially active segment of the Los Osos Fault is located in the vicinity of the onshore and offshore work areas of JUS S9 Montaña and an offshore segment of the San Andreas Fault may intersect the offshore work area of JUS S9 Manchester and JUS S8. In the event of a major earthquake, all Project work areas would be subjected to strong ground shaking and possible fault rupture from nearby active faults in the region. Regardless, the Project would remove the cable segments and they would no longer be susceptible to strong ground shaking or fault rupture.

In addition, in accordance with CEQA, this analysis addresses the potential impacts of the Project on the environment; it does not address the potential impact that the environment could inflict on the Project. As stated by the California Supreme Court, "agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project's future users or residents. But when a proposed project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users" (*California Building Industry Association v. Bay Area Air Quality Management District* [2015] 62 Cal.4th 369, 386 [*CBIA*]).

Cable removal activities such as excavation of the conduit exit points with hand jets and hand tools, cable anchor removal, vessel anchoring, and cable removal from the seafloor by the CRV would not involve any strong forces that

could trigger or exacerbate the potential for seismic impacts such as movement on existing faults or ground shaking and ground failure resulting in liquefaction and lateral spreading. Therefore, there would be no impact.

iv) Landslides?

Less than Significant Impact

Onshore Work Area

The onshore JUS S9 Montaña work activities would be in the Sandspit parking lot of Montaña de Oro State Park. The parking lot is relatively flat, paved, (see *Section 3.8.1.2*) and the area adjacent to the parking lot does not consist of any steep slopes. All work would occur within the existing utility access point with no ground disturbance. In addition, cable removal from within the cable conduit would not cause any instability to the surrounding ground (sand dunes and coastal area) because the conduits would remain in place. Therefore, there would be no impact.

Offshore Work Areas

Cable removal activities involving the DSV (vessel anchoring, conduit exit excavation with hand jets, cable cutting, and cable anchor removal at JUS S9 Montaña) in all offshore work areas would take place on gently sloping seafloor (Sections 3.8.1.2 and 3.8.1.3), which has low potential for slope instability. A majority of the cables are buried at depths of 1.5 to 6.5 feet deep, which would result in low sediment displacement during removal, and the remaining cable segments are exposed on rock sections of the seafloor. In addition, the CRV (*Sections 2.4.1 and 2.5.2*) would pull the cables vertically and in alignment with its position on the seafloor during removal, which would also result in a low amount of side casting and disturbance of seafloor sediments. Therefore, the impact would be less than significant.

b) Result in substantial soil erosion or the loss of topsoil?

No Impact

Onshore work would only be completed for JUS S9 Montaña. As discussed in a), above, the onshore work activities would have no soil disturbance. Therefore, there would be no impact.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less than Significant Impact

The onshore Project work area is not located in an area of known land subsidence due to groundwater pumping, peat loss, or oil extraction (USGS 2025), and the Project does not involve groundwater pumping or oil extraction that could potentially cause subsidence. However, as discussed in a), above, offshore Project activities would have a less-than-significant impact on landslide potential. Therefore, the impact would be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

(d and e) No Impact

As discussed in a), above, the onshore work area would be in the paved Sandspit parking lot of Montaña de Oro State Park with no soil disturbance. In addition, no septic tanks or alternative wastewater disposal systems would be constructed or used at the Project work areas. Wastewater disposal required for Project workers would occur in portable toilets at the Sandspit parking lot and in offshore vessel restrooms. Therefore, there would be no impact.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact

Although the underlying sediments of the JUS S9 Montaña onshore work area are the correct age for preserving fossils, the onshore work activities do not involve any ground excavation. Cable cutting would be accomplished through use of hand tools within the utility access point. Therefore, there would be no impact.

Offshore Project work activities in the JUS S9 Montaña work area and the JUS S9 Manchester and JUS S8 work area would be located in previously disturbed sediments and cable removal activities (vessel anchoring, excavation of the conduit exit point with hand jets, cable anchor removal, and cable removal

from the seafloor) would take place at relatively shallow depths (1.5 to 6.5 feet deep). Therefore, there would be no impact.

3.8.4 Mitigation Summary

The Project would have no significant impact related to geology, soils, and paleontological resources; therefore, no mitigation is required.

3.9 GREENHOUSE GAS EMISSIONS

GREENHOUSE GAS EMISSIONS – Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

3.9.1 Environmental Setting

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended period (decades or longer). The Earth's atmospheric temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in this energy balance. The greenhouse effect is the trapping and buildup of heat in the atmosphere near the Earth's surface (the troposphere). The greenhouse effect is a natural process that contributes to regulating air temperatures, and it creates a livable environment on Earth. Human activities that emit GHGs increase the amount of infrared radiation that is absorbed and trapped by the atmosphere, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHG emissions. Thus, GHG impacts are recognized exclusively as cumulative impacts (California Air Pollution Control Officers Association 2008).

A GHG is any gas that absorbs infrared radiation and traps heat in the atmosphere. As defined in California Health and Safety Code section 38505,

subd. (g), for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride (see also CEQA Guidelines, § 15364.5). These GHGs trap and build up heat in the atmosphere near the Earth's surface, commonly known as the Greenhouse Effect. The atmosphere and the oceans are reaching their capacity to absorb CO_2 and other GHGs, leading to significant global climate change. Unlike criteria pollutants and TACs, which are pollutants of regional and local concern, GHGs and climate change are a local, regional, and global issue. There is widespread international scientific consensus that human-caused increases in GHGs have and will continue to contribute to climate change.

The Intergovernmental Panel on Climate Change (IPCC), in the section of its Sixth Assessment Report (AR6) by Working Group I, "Climate Change 2021: The Physical Science Basis," (IPCC 2021; released August 7, 2021) Human Influence on the Climate System (Chapter 3), stated in part:

> *The evidence for human influence on recent climate change strengthened from the IPCC Second Assessment Report to the IPCC Fifth Assessment Report and is now even stronger in this assessment. The IPCC Second Assessment Report (1995) concluded 'the balance of evidence suggests that there is a discernible human influence on global climate'. In subsequent assessments the evidence for human influence on the climate system was found to have progressively strengthened. AR5 concluded that human influence on the climate system is clear, evident from increasing greenhouse gas concentrations in the atmosphere, positive radiative forcing, observed warming, and physical understanding of the climate system.*
>
> *It is unequivocal that human influence has warmed the global climate system since pre-industrial times. Combining the evidence from across the climate system increases the level of confidence in the attribution of observed climate change to human influence and reduces the uncertainties associated with assessments based on single variables. Large-scale indicators of climate change in the atmosphere, ocean, cryosphere and at the land surface show clear responses to human influence*

> *consistent with those expected based on model simulations and physical understanding.*

AR6 indicated that, due to climate change, average temperatures in North America are very likely to increase and will continue to do so in future decades. Extreme temperatures in all regions of North America are projected to increase in intensity, frequency and duration, and cold spells are projected to decrease. The report indicates a medium confidence of a precipitation decrease in the western and southwestern portions of North America (IPCC 2021).

According to the IPCC, the concentration of CO_2, the primary GHG, has increased from approximately 280 parts per million (ppm) in pre-industrial times (Fifth Assessment Report) to well over 410 ppm in 2021 (AR6). CO_2 concentrations as of 2019 are increasing about 1.9 ppm/year; present CO_2 concentrations are higher than any time in at least the last 2 million years. CO_2 is used as a reference gas for climate change. To account for different GHG global warming potentials for other gases, emissions are often quantified and reported as CO_2 equivalents (CO_2e). Consistent with CalEEMod Version 2022.1, the global warming potential for CH_4 is assumed to be 25 (i.e., emissions of 1 metric ton [MT] CH_4 are equivalent to emissions of 25 MT CO_2) and the global warming potential for nitrous oxide is 298, based on the IPCC's Fourth Assessment Report (IPCC 2007).

3.9.2 Regulatory Setting

Federal and state laws and regulations pertaining to GHG emissions and relevant to the Project are identified in Appendix A. At the local level, applicable policies and programs are included in Appendix B. As noted in *Section 1.4, Project Background and Objectives*, SLOAPCD has asserted CEQA authority to regulate air quality emissions out to California's Coastal Waters boundary (Cal. Code Regs., tit. 17, § 70500), which extends approximately 38 nm offshore from Morro Bay. The MCAQMD has asserted jurisdiction out to California's offshore boundary, located approximately 3 nm offshore Mendocino County (Stephens, pers. comm., 2026). *Section 3.9* analyzes the quantitative and qualitative GHG impacts consistent with each District's stated regulatory jurisdiction.

3.9.2.1 Thresholds of Significance

MCAQMD and Mendocino County have not adopted numerical GHG thresholds of significance for construction activities (MCAQMD 2010). MCAQMD identified GHG emissions thresholds for operational related activities of 1,100 MT CO_2e per year or 4.6 MT CO_2e per service population per year (residents + employees) for projects other than stationary sources. SLOAPCD has not adopted numerical GHG thresholds of significance for construction activities only, and requires construction GHG emissions to be amortized and combined with operational emissions. SLOAPCD has developed efficiency and bright-line thresholds for 2021 through 2045 for residential, commercial, and mixed-use new developments based on Senate Bill (SB) 32 and AB 1279. The SLOAPCD 2026 numerical GHG thresholds of significance are 3.8 MT CO_2e per service population per year or 830 MT CO_2e per year (SLOAPCD 2023).

3.9.3 Impact Analysis

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact

As calculated in Appendix C, the estimated total GHG emissions during Project work activities would be approximately 1,072 MT CO_2e within SLOAPCD's jurisdiction and 184 MT CO_2e within MCAQMD's jurisdiction. Estimated Project-generated emissions within SLOAPCD jurisdiction, amortized over 30 years, would be approximately 35.73 MT CO_2e per year, which would not exceed SLOAPCD's annual 830 MT CO_2e threshold. The Project would generate approximately 184 MT CO_2e within MCAQMD jurisdiction, which would not exceed MCAQMD's annual 1,100 MT CO_2e threshold. In addition, the Project would not result in any new long-term GHG emissions. Therefore, the impact would be less than significant.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

No Impact

The Project would generate minimal, temporary GHG emissions from Project activities. The Project does not have an operational component and would not conflict with CARB's 2017 Scoping Plan or 2022 Scoping Plan, which prioritize emissions reductions from long-term sources. At the local level, the Mendocino

Council of Governments Regional Transportation Plan/Active Transportation Plan (RTP/ATP) (MCOG 2026) and the San Luis Obispo Council of Governments (SLOCOG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SLOCOG 2023) are long-range planning documents that aim to integrate transportation, land use, and housing to meet GHG reduction targets. The County of San Luis Obispo EnergyWise Plan and EnergyWise Plan Update include goals, measures, and actions related to energy and water use, solid waste and renewable energy generation, transportation systems, and agricultural practices to meet the state's efforts to reduce GHG emissions as outlined in AB 32 in San Luis Obispo County (County of San Luis Obispo 2011, 2016). The goals, measures, actions, and strategies in the Mendocino Council of Governments RTP/ATP, SLOCOG RTP/SCS, and County of San Luis Obispo EnergyWise Plan and EnergyWise Plan Update would not apply to the Project and the Project would not conflict with local policies or plans or obstruct the state's ability to achieve its carbon neutrality targets. Therefore, there would be no impact.

3.9.4 Mitigation Summary

The Project would have no significant impact related to GHG emissions; therefore, no mitigation is required.

3.10 HAZARDS AND HAZARDOUS MATERIALS

HAZARDS AND HAZARDOUS MATERIALS – Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use	☐	☐	☐	☒

HAZARDS AND HAZARDOUS MATERIALS – Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
airport, would the project result in a safety hazard or excessive noise or people residing or working in the project area?				
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

3.10.1 Environmental Setting

3.10.1.1 JUS S9 Montaña – San Luis Obispo County

The JUS S9 Montaña work activities are within and offshore of Montaña de Oro State Park. Onshore activities are limited to the Sandspit parking lot within Montaña de Oro State Park. The closest school is Monarch Grove Elementary School, located approximately 1.6 miles northeast of the onshore work area at 348 Los Osos Valley Road in Los Osos. The closest public-use airport is the San Luis Obispo County Regional Airport, located approximately 13.9 miles southeast of the onshore work area.

The California Environmental Protection Agency Cortese List Data Resources website was searched on November 21, 2025. No listings pertaining to JUS S9 Montaña were found during the online review of the California Department of Toxic Substances Control's EnviroStor database (DTSC 2025a). The nearest identified active site is the BPTA, a State Response Site, located approximately 0.4 mile northeast of the onshore work area (DTSC 2025a). The State Water Resources Control Board (SWRCB) GeoTracker site did not identify any active cleanup sites within the onshore work area (SWRCB 2025a). No sites in Montaña de Oro State Park or San Luis Obispo County were identified on the SWRCB's

Sites Identified with Waste Constituents above Hazardous Waste Levels Outside the Waste Management Unit (Cal/EPA 2025). No sites were listed in Montaña de Oro State Park for SWRCB's Cease and Desist Orders and Cleanup and Abatement Orders list (SWRCB 2025b). Additionally, no sites in Montaña de Oro State Park are on the California Environmental Protection Agency's list of hazardous waste facilities subject to corrective action pursuant to Health and Safety Code section 25187.5, identified by the California Department of Toxic Substances Control (DTSC 2025b).

3.10.1.2 JUS S9 Manchester and JUS S8 – Mendocino County

The JUS S9 Manchester and JUS S8 work activities only occur offshore of Manchester State Park in Mendocino County. Therefore, information related to schools, public-use airports, federal or state hazardous list sites, and emergency evacuation or response plans is not applicable to JUS S9 Manchester and JUS S8.

3.10.2 Regulatory Setting

Federal and state laws and regulations pertaining to hazards and hazardous materials and relevant to the Project are identified in Appendix A. At the local level, applicable policies and programs are included in Appendix B.

The International Convention for the Prevention of Pollution from Ships is the main international convention that addresses potential operational or accidental pollution by ships into the marine environment. The Convention includes regulations and currently includes six technical Annexes. Special Areas with strict controls on operational discharges are included in most Annexes.

3.10.3 Impact Analysis

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

(a and b) Less than Significant with Mitigation

The Project would involve routine transport, storage, use, and disposal of small quantities of hazardous materials during Project work activities such as gasoline, diesel, lubricants, and solvents. The use, handling, transportation, storage, and disposal of these hazardous materials (necessary for Project-related work) would

be regulated by existing laws and regulations. However, improper storage and the lack of safe handling of hazardous materials or accidental petroleum spills (from marine vessels and Project equipment) could be considered a potentially significant impact by creating a hazard to the public and the environment. **MM HAZ-1** and **MM HAZ-2** would ensure protection of the public, Project personnel, and the environment from the accidental release of hazardous materials by including plans and responses that would include separate storage for incompatible hazardous materials, secondary containment for hazardous materials storage, trained personnel for hazardous materials handling, and spill contingency plans. With implementation of these measures, the impact would be less than significant.

MM HAZ-1: Vessel Waste Management Plan. The Applicant shall prepare a Vessel Waste Management Plan, which will require that all vessels be equipped to collect, contain, and treat waste products, including solid waste, and petroleum/hazardous waste. All debris falling into the water must be documented by time, date, location, and recovery action taken. This Plan shall be submitted to CSLC for approval 30 days prior to the initiation of marine vessel activities. All documented incidents shall be reported to CSLC and other relevant agencies in a final report at the end of cable removal activities in state waters.

MM HAZ-2: Shipboard Oil Pollution Emergency Plan. The Applicant shall prepare Shipboard Oil Pollution Emergency Plans (SOPEPs) that must be implemented during Project operations and submitted to CSLC for approval 30 days prior to the initiation of Project work activities. The SOPEPs must be compliant with the International Convention for the Prevention of Pollution from Ships (MARPOL) Annex I (Prevention of Pollution by Oil) and V (Prevention of Pollution by Garbage from Ships). The SOPEPs must contain preventative measures and procedures that will be followed in the event of a spill in the marine environment and will include at a minimum:

- Purpose and need for the plan
- Assessment of potential hazards
- Spill prevention and containment
- Emergency response procedures

- Reporting procedures to the CSLC and other relevant agencies
- Closing of the spill incident
- Spill notification contact list

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

(c to e) No Impact

The Project does not occur within one-quarter mile of an existing or proposed school, within a known hazardous waste site, or within an airport land use plan or within two miles of an airport (see *Section 3.10.1, Environmental Setting*). Therefore, there would be no impacts.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact

The onshore work area for JUS S9 Montaña would be located within the Sandspit parking lot, a flat, paved area off of Sand Spit Road and Pecho Valley Road. Proposed Project work activities would not block roads or emergency evacuation routes, and emergency access to the Sandspit parking lot would be maintained. As the Project would not alter existing conditions for emergency response during Project work activities, the Project would not impair implementation of, or physically interfere with, the San Luis Obispo Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) (County of San Luis Obispo 2025b). Therefore, there would be no impact.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

No Impact

While the JUS S9 Montaña onshore work area is within a Very High Fire Hazard Severity Zone in a state responsibility area, the work activities would occur in the Sandspit parking lot. The Project's use of a circular saw to cut the cable in the utility access point could provide a potential ignition source, but the paved work area in the middle of the parking lot would negate concerns regarding forest, brush, or grass ignition. In addition, standard safety measures for the use of circular saws (e.g., spark arrestors) would be implemented. Therefore, there would be no impact.

3.10.4 Mitigation Summary

Implementation of the following mitigation measures would reduce the potential for Project-related impacts from hazards and hazardous materials to less than significant:

- **MM HAZ-1: Vessel Waste Management Plan**
- **MM HAZ-2: Shipboard Oil Pollution Emergency Plan**

3.11 HYDROLOGY AND WATER QUALITY

HYDROLOGY AND WATER QUALITY - Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:	☐	☐	☐	☒
i) Result in substantial erosion or siltation on or off site;	☐	☐	☐	☒
ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site;	☐	☐	☐	☒
iii) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial	☐	☐	☐	☒

HYDROLOGY AND WATER QUALITY - Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
additional sources of polluted runoff; or				
iv) Impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☒	☐	☐

3.11.1 Environmental Setting

3.11.1.1 JUS S9 Montaña – San Luis Obispo County

Onshore Work Area

The onshore work area of the JUS S9 Montaña alignment is limited to the Sandspit parking lot in Montaña de Oro State Park. No wetlands are located within or adjacent to the onshore work area (Padre 2024), which is located in an area of coastal sand dunes. The parking lot is paved and relatively flat-lying. Stormwater runoff occurs as sheetflow and in small drainages through the hummocky (consisting of mounds or bumps) dune topography toward the Pacific Ocean, located approximately 1,500 feet west of the Sandspit parking lot.

Based on the coastal dune environment, groundwater beneath the onshore work area is likely in alignment with sea level, or approximately 140 feet below ground surface.

The onshore work area is not located within a tsunami hazard area, as mapped by the California Geological Survey (CGS 2025b), or 100-year flood zone, as mapped by the Federal Emergency Management Agency (FEMA 2017).

Offshore Work Area

Ocean conditions in the shallow, coastal portion of the offshore work area of JUS S9 Montaña are dynamic, characterized by strong winds and associated waves and surface currents, particularly during winter and spring. In the open ocean, closer to the edge of the continental shelf, the California Current system consists of generally offshore, southward-flowing current at the surface; a deep-water undercurrent that flows northward and sometimes surfaces during fall and winter; and the inshore Davidson current, which flows northward during October to April (Padre 2024).

Water quality over the continental shelf along JUS S9 Montaña is generally good, as marine waters in this area are thoroughly mixed due to upwelling, waves, and currents, and there are few and relatively small or distant potential sources of pollutants. The nearest municipal outfall, serving Morro Bay and Cayucos, is located off Cayucos about 6 miles to the north. Sediments dredged from Morro Bay are occasionally deposited off the sand spit just south of the harbor entrance. Inputs of terrestrial sediments from local creeks, the largest of which (Los Osos Creek and Chorro Creek) discharge into the sheltered waters of Morro Bay, occur primarily during brief periods of heavy runoff associated with winter storms. Incidental releases of small quantities of waste likely occur from recreational and commercial vessels (Padre 2024).

3.11.1.2 JUS S9 Manchester and JUS S8 – Mendocino County

Ocean conditions in the shallow, coastal portion of JUS S9 Manchester and JUS S8 are dynamic, characterized by strong winds and associated waves and surface currents, particularly during winter and spring. In the open ocean, closer to the edge of the continental shelf, the California Current system predominates. The system is composed of the generally offshore, southward-flowing current at the surface and a deep-water undercurrent that flows northward and sometimes surfaces during fall and winter (Padre 2024).

Water quality in the waters over the continental shelf in the area of JUS S9 Manchester and JUS S8 is generally good, as the marine waters are thoroughly mixed as a result of upwelling, waves, and currents. Inputs of terrestrial sediments from local creeks and rivers occur primarily during brief periods of heavy runoff associated with winter storms. The largest nearby creek is Brush Creek, located approximately 1,700 feet south of the Manchester utility access point, and the largest nearby river is Garcia River, located approximately 2.3 miles south of the

Manchester Cable Landing Station. Incidental releases of small quantities of waste likely occur from recreational and commercial vessels. Contaminated sediments are not known or expected to occur in any of the areas crossed by the cables (Padre 2024).

3.11.2 Regulatory Setting

Federal and state laws and regulations pertaining to hydrology and water quality and relevant to the Project are identified in Appendix A. Specifically, any in-water work for the Project would be required to comply with Vessel General Permits as required by Clean Water Act section 402.

With respect to the onshore JUS S9 Montaña work area, the Regional Water Quality Control Board Water Quality Control Plan for the Central Coastal Basin (Basin Plan) (Central Coast RWQCB 2024) was established by SWRCB to develop water quality control policies and regulations. The Basin Plan contains region-specific water quality regulations that recognize beneficial uses, water quality characteristics, and water quality problems. The Basin Plan also includes specific water quality objectives that must be attained or maintained to protect designated beneficial uses. The Basin Plan lists general policies that apply to all state waters, which fall under SWRCB Resolution No. 68-16, commonly referred to as "California's Antidegradation Policy." Any actions that adversely affect water quality in all surface waters and groundwater must be consistent with the maximum benefit to the people of the state, must not unreasonably affect present and anticipated beneficial use of such water, and must not result in water quality less than that prescribed in water quality plans and policies.

With respect to marine waters, the Water Quality Control Plan, Ocean Waters of California (California Ocean Plan) (SWRCB 2019) was established by SWRCB to protect the quality of the ocean waters for use and enjoyment by the people and use of marine species of the state. The plan requires control of the discharge of waste to ocean waters and control of intake seawater. The California Ocean Plan is applicable to point source discharges to the ocean and nonpoint sources of waste discharges to the ocean. This plan sets forth limits or levels of water quality characteristics for ocean waters to ensure the reasonable protection of beneficial uses and the prevention of nuisance.

3.11.3 Impact Analysis

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less than Significant with Mitigation

Onshore Work Area

The onshore JUS S9 Montaña work area is limited to the Sandspit parking lot in Montaña de Oro State Park, which is located in an area of coastal sand dunes. Cable cutting activities in the utility access point would not require any ground disturbance (see *Section 2.4.2* for more details). Therefore, the impact would be less than significant.

Offshore Work Areas

Marine vessels (CRV, DSV, tugboat, and other support vessels) would be used in shallow, coastal, and open water offshore Project work areas (see *Sections 2.4, JUS S9 Montaña Activities, and 2.5, Manchester JUS9 and JUS S8 Activities*). Marine vessels could accidentally discharge sewage waste, bilge water, debris, or ballast water. These discharges could result in an increase in organic suspended solids and could alter biological oxygen demand and dissolved oxygen levels in the water column. As noted in *Section 3.11.2, Regulatory Setting*, all Project vessels must comply with Vessel General Permits under Clean Water Act section 402, which limit incidental discharges—such as lubricants—within 3 nm of the U.S. coastline. Vessels must use environmentally acceptable lubricants and implement preventive measures. Any ballast water discharge must be recorded by location and volume, and any debris entering the water must be documented with time, date, and location (EPA 2025). In addition, **MM HAZ-1** (Vessel Waste Management Plan) ensures that all vessels would be equipped to collect, contain, and treat waste products.

Project vessels could also accidentally discharge fuel or other hazardous fluids into marine waters. Accidental petroleum discharge or other spills from vessels may be significant depending on the quantity of the release, although a large release is unlikely. **MM HAZ-2** (Shipboard Oil Pollution Emergency Plan) would minimize accidental petroleum discharge or other spills from vessels and, in the event such a discharge or spill occurs, provide implementation and reporting requirements associated with containment and cleanup of the discharge or spill. With implementation of these measures, the impact would be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact

No water would be required for any Project activities and no ground disturbance or new impervious surfaces that could potentially impede groundwater recharge would be created in the JUS S9 Montaña onshore work area (*Section 2.4.2, Onshore Cable Cutting*). Therefore, no impact would occur.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:

- ***i) Result in substantial erosion or siltation on or off site;***
- ***ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site;***
- ***iii) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;***
- ***iv) Impede or redirect flood flows?***

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

(c and d) No Impact

As discussed in *Section 3.11.1, Environmental Setting*, the onshore JUS S9 Montaña work area is limited to the relatively flat-lying Sandspit parking lot. No ground disturbance or alteration of the existing drainage pattern, no additional impervious surfaces, or substantial sources of polluted runoff would be created as part of the Project. Therefore, no impact would occur.

The onshore JUS S9 Montaña work area is not located in a 100-year flood zone or tsunami hazard area (*see Section 3.11.1, Onshore Work Area*) and cable cutting activities would not impede or redirect flood flows or risk release of pollutants due to Project inundation. Therefore, no impact would occur.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant with Mitigation

The relevant water quality control plans are the Basin Plan and the California Ocean Plan, which establish water quality objectives to protect beneficial uses of inland and marine waters, including groundwater and ocean resources. As previously discussed in a), above, fuel and other spills from marine vessels could result in water quality impacts, but implementation of **MM HAZ-1** and **MM HAZ-2** would reduce the potential for the Project to substantially degrade water quality, which is consistent with the objectives and policies of the Basin Plan and Ocean Plan. With implementation of these measures, the impact would be less than significant.

As discussed in b), above, no freshwater would be required for any Project activities and no new impervious surfaces would be created as part of the Project. Therefore, there would be no impact.

3.11.4 Mitigation Summary

Implementation of the following mitigation measures would reduce the potential for Project-related impacts to hydrology and water quality to less than significant.

- **MM HAZ-1: Vessel Waste Management Plan**
- **MM HAZ-2: Shipboard Oil Pollution Emergency Plan**

3.12 LAND USE AND PLANNING

LAND USE AND PLANNING – Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

JUS S9 Montaña requires an onshore work area. JUS S9 Manchester and JUS S8 do not require an onshore work area. Therefore, the IS/MND will only focus on Land Use and Planning that is relevant to the onshore work area in San Luis Obispo County.

3.12.1 Environmental Setting

The JUS S9 Montaña work activities are within and offshore of Montaña de Oro State Park in San Luis Obispo County. Onshore activities are limited to the Sandspit parking lot. The Sandspit parking lot and surrounding Montaña de Oro State Park area are designated and zoned as Recreation (County of San Luis Obispo 2025a).

3.12.2 Regulatory Setting

Federal and state laws and regulations pertaining to land use and planning and relevant to the Project are identified in Appendix A. At the local level, applicable policies and programs are included in Appendix B.

3.12.3 Impact Analysis

a) Physically divide an established community?

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

(a and b) No Impact

The Project does not propose any new roadways, structures, or other components that would physically divide an established community. In addition, the Project does not propose any change in land use that would conflict with local land use plans, policies, or regulations. The Project does not conflict with San Luis Obispo Coastal Plan (2007) Policy 1, which protects recreational opportunities and their associated facilities, as the work activities in the Sandspit parking lot (see *Section 2.2.1, JUS S9 Montaña – San Luis Obispo County*, for description of the Project work area) would only require the use of approximately six parking spaces and would not require the closure of the entire parking lot. As discussed in *Section 3.4.3.6*, the Manchester and Montaña de Oro Project work areas do not overlap with any CDFW Natural Community Conservation Plan/Habitat Conservation Plan area. Finally, the onshore work area would ultimately revert to pre-Project conditions. Therefore, there would be no impact.

3.12.4 Mitigation Summary

The Project would have no impact to land use and planning; therefore, no mitigation is required.

3.13 MINERAL RESOURCES

MINERAL RESOURCES – Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

3.13.1 Environmental Setting

3.13.1.1 JUS S9 Montaña – San Luis Obispo County

The JUS S9 Montaña work activities would occur within and offshore of Montaña de Oro State Park. Onshore activities are limited to the Sandspit parking lot, which does not obstruct any identified mineral resource areas of value to the region. The Sandspit parking lot is not identified as an energy and extractive resource area in within the Conservation and Open Space Element (County of San Luis Obispo 2010). In addition, the closest quarry (rock) is the Beecham Red Rock Quarry located approximately 4.8 miles east of the Project site (Division of Mine Reclamation 2016). The offshore work area is not designated on state or local maps as an area having minerals of state, regional, or local importance and the Conservation and Open Space Element also does not identify mineral resources within the offshore work area (County of San Luis Obispo 2010).

3.13.1.2 JUS S9 Manchester and JUS S8 – Mendocino County

The JUS S9 Manchester and JUS S8 work areas are offshore of Manchester State Park. Nearshore activities would occur near the Manchester Cable Landing Station and Manchester State Park; however, neither contain aggregate or mineral resources or resource areas of value to the region (County of

Mendocino 2008). In addition, the closest quarry (bituminous rock) is the Bald Hills Quarry located approximately 30.9 miles northeast of the nearshore work area (Division of Mine Reclamation 2016). The offshore work area is not designated on state or local maps as an area having minerals of state, regional, or local importance and mineral resource mapping for the General Plan Update EIR also does not identify mineral resources within the offshore work area (County of Mendocino 2008).

3.13.2 Regulatory Setting

State laws and regulations pertaining to mineral resources and relevant to the Project are identified in Appendix A. At the local level, applicable policies and programs are included in Appendix B.

3.13.3 Impact Analysis

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

(a and b) No Impact

There are no mineral resources recovery sites or known mineral resources in or near the Project work areas, and Project activities would not hinder access to any mineral resource extractions in the vicinity or region. Therefore, there would be no impact.

3.13.4 Mitigation Summary

The Project would have no impact to mineral resources; therefore, no mitigation is required.

3.14 NOISE

NOISE – Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generate excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☐	☒
c) Be located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport and expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

3.14.1 Environmental Setting

The Project's only onshore work area is the 50-space Sandspit parking lot within Montaña de Oro State Park, San Luis Obispo County. The surrounding area is primarily natural open space, with recreational users (park visitors, hikers, beachgoers) as the only sensitive receptors. No residential or commercial uses are located in the immediate vicinity. Ambient noise levels are generally low, dominated by natural sounds and occasional vehicle traffic associated with park use. The nearest noise-sensitive, residential (human) receptors are:

- JUS S9 Montaña onshore work area: 3,170 feet away

- JUS S9 Montaña offshore work area: 4,630 feet away
- JUS S9 Manchester and S8 offshore work area: 3,600 feet away

3.14.1.1 Noise and Vibration Fundamentals

Noise is generally defined as unwanted sound. Sound is measured in decibels (dB), which represent the amplitude or loudness of sound on a logarithmic scale. Because the human ear is more sensitive to mid-range frequencies, environmental noise is typically expressed in A-weighted decibels (dBA), which adjust for human hearing sensitivity. For context, normal conversation is about 60 dBA, heavy traffic at 300 feet is about 70 dBA, and a gas lawn mower at 3 feet is about 90 dBA. A change of 3 dBA is barely perceptible, whereas 10 dBA is perceived as a doubling or halving of loudness.

In contrast to airborne noise, ground-borne vibration is not a common environmental problem. Vibration from sources such as buses and trucks are not usually perceptible, even in locations close to major roads. Some common sources of ground-borne vibration are trains, buses on rough roads, and construction activities such as blasting, pile-driving, and operating heavy earth-moving equipment.

Ground-borne vibration can cause detectable building floor movement, window rattling, items shaking on shelves or walls, and rumbling sounds. In extreme cases, the vibration can cause damage to buildings. Building damage is not a factor for most projects, with the occasional exception of blasting and pile-driving during construction. Human annoyance from vibration can often occur and can happen when the vibration exceeds the threshold of perception by only a small margin. A vibration level that causes annoyance would be well below the damage threshold for normal buildings.

Vibration is an oscillatory motion that can be described in terms of displacement, velocity, or acceleration. Displacement is the easiest descriptor to understand. For a vibrating floor, the displacement is simply the distance that a point on the floor moves away from its static position. The velocity represents the instantaneous speed of the floor movement, and acceleration is the rate of change of the speed. The peak particle velocity is defined as the maximum instantaneous positive or negative peak of the vibration signal. Peak particle velocity is often used in monitoring of blasting vibration since it is related to the stresses that buildings undergo.

3.14.2 Regulatory Setting

Federal and state laws and regulations pertaining to noise and relevant to the Project are identified in Appendix A. The Project is located within Montaña de Oro State Park, which is managed by California State Parks; however, San Luis Obispo County noise standards are used as a reference for evaluating potential impacts to park users.

3.14.3 Impact Analysis

a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant Impact

Onshore construction activities would be limited to the Sandspit parking lot at Montaña de Oro State Park and would involve a small crew using hand tools (e.g., circular saws), utility trucks, and light equipment. No heavy construction equipment or pile driving would be used. All Project activities in the parking lot would occur during daylight hours, which complies with the San Luis Obispo County noise standards for construction (typically 7:00 a.m. to 9:00 p.m.). Noise from Project activities would be exempt from other San Luis Obispo County noise standards. The primary receptors in the immediate vicinity of the JUS S9 Montaña onshore work area are park visitors. However, the limited scope, short duration (approximately 3.5 days), and daytime schedule of the JUS S9 Montaña onshore work activities, combined with the open nature of the parking lot, elevated baseline sound levels from vehicle ingress and egress, and continued access to park amenities, would minimize potential annoyance. No permanent noise sources would be introduced. Therefore, the impact would be less than significant.

Project activities also include offshore vessel operations (e.g., CRV, DSV, tugboat, and support vessels). These vessels would operate for 12 to 24 hours per day. Typical diesel-powered marine vessels are regulated to produce no more than 75 dBA at 50 feet during operation, or a maximum of 88 dBA (SAE 2025). At the approximately 3,000-foot distance to the nearest onshore sensitive receptors, the noise would decrease substantially; dropping to an estimated 35 dBA, which is below the typical ambient coastal sound levels and well below the noise level of a normal conversation. Given the slow vessel speeds, required

mufflers, and significant distance, marine vessel noise would not substantially contribute to onshore ambient noise levels. Therefore, this impact would be less than significant.

b) Generate excessive ground-borne vibration or ground-borne noise levels?

No Impact

Onshore work activities would not involve the use of heavy equipment, vibratory rollers, or pile driving—common sources of ground-borne vibration. All onshore work would be limited to hand tools and light vehicles (*Section 2.4.2*). Ground-borne vibration and noise dissipate rapidly with distance and are typically only perceptible within a few dozen feet of the source.

Given that the nearest sensitive receptors are over 3,000 feet away, and that vibration levels from the proposed activities would be negligible even at the source, there is no potential for excessive ground-borne vibration or ground-borne noise to affect off-site receptors. Therefore, there would be no impact.

c) Be located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport and expose people residing or working in the project area to excessive noise levels?

No Impact

The Project site is not located within 2 miles of a public airport or private airstrip, nor is it within an airport land use plan area. Therefore, there would be no impact.

3.14.4 Mitigation Summary

The Project would have no significant impact related to noise and vibration; therefore, no mitigation is required.

3.15 POPULATION AND HOUSING

POPULATION AND HOUSING – Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

JUS S9 Montaña requires an onshore work area. JUS S9 Manchester and JUS S8 do not require an onshore work area. Therefore, the IS/MND will only focus on Population and Housing that is relevant to the onshore work area in San Luis Obispo County.

3.15.1 Environmental Setting

The JUS S9 Montaña onshore work area is limited to the Sandspit parking lot and is located in Census Tract 130 in San Luis Obispo County, with an estimated population of 2,468 (California Department of Finance Demographic Research Unit 2025). The closest residences are along Pecho Valley Road, approximately 0.6 mile to the northeast.

3.15.2 Regulatory Setting

There are no federal and state laws and regulations pertaining to population and housing that are relevant to the Project. At the local level, no housing goals or policies are applicable to the Project site or Project activities.

3.15.3 Impact Analysis

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

(a and b) No Impact

The Project would not construct any new homes or businesses. While a limited number of crew would be working on the Project, both offshore and onshore, they would either already reside in the local area or surrounding area or would be staying in short-term (rental) housing or hotel accommodations and would not require the introduction of any permanent housing or other structures. Offshore crew would be residing on the vessels for the duration of Project activities. Therefore, there would be no impact.

3.15.4 Mitigation Summary

The Project would have no impact to Population and Housing; therefore, no mitigation is required.

3.16 PUBLIC SERVICES

PUBLIC SERVICES	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police Protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

JUS S9 Montaña requires an onshore work area. JUS S9 Manchester and JUS S8 do not require an onshore work area. Therefore, the IS/MND will only focus on Public Services that are relevant to the onshore work area in San Luis Obispo County.

3.16.1 Environmental Setting

Fire Protection Services. Fire protection services are provided by the San Luis Obispo County Fire Department. The California Department of Forestry and Fire Protection (CAL FIRE) functions as the County Fire Department under a contract with the County of San Luis Obispo (San Luis Obispo County Fire Department 2025). The closest fire station is CAL FIRE/South Bay Station 15, located at 2315

Bayview Heights Drive in Los Osos, approximately 2.3 miles east of the Sandspit parking lot.

Police Protection Services. Police protection services are provided by the San Luis Obispo County Sheriff's office (San Luis Obispo County Sheriff's Office 2025). The closest police station is located at 2099 10th Street in Los Osos, approximately 2.4 miles northeast of the onshore work area. The California Highway Patrol also provides police protection for the Project site.

Schools. The onshore work area is located within the San Luis Coastal Unified School District, which operates 10 elementary schools, two middle schools, three high schools, and one adult school (San Luis Coastal Unified School District 2025). The closest school is Monarch Grove Elementary School, located approximately 1.6 miles northeast of the onshore work area.

Parks and Recreation Facilities. Montaña de Oro State Park covers 8,000 acres and offers picnic and beach areas, camping, biking, hiking, horseback riding, fishing, scuba diving/snorkeling, and windsurfing/surfing (State Parks 2025a). The closest San Luis Obispo County park is Los Osos Community Park, located at 2180 Palisades Avenue in Los Osos, approximately 2.2 miles northeast of the onshore work area.

3.16.2 Regulatory Setting

Federal and state laws, regulations, and policies pertaining to public service and relevant to the Project are identified in Appendix A. At the local level, no goals, policies, or regulations related to public services are applicable to the Project.

3.16.3 Impact Analysis

a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire protection?

Police Protection?

Schools?

Parks?

Other public facilities?

Less than Significant Impact

JUS S9 Montaña onshore work activities would occur in the Sandspit parking lot in Montaña de Oro State Park and would result in the closure of six parking spaces for 3.5 days (see *Sections 2.2.1, JUS S9 Montaña – San Luis Obispo, and 2.7, Project Work Schedule*). The six parking spaces would be unavailable for public use during the onshore work activities; however, the parking lot has 50 parking spaces available and so the onshore work activities would not significantly affect use of the Sandspit parking lot or Montaña de Oro State Park. Upon completion of the onshore work activities, public use of the Sandspit parking lot would resume similar to existing conditions. the impact to parks would be less than significant.

The Project would not result in an increase in the number of public service calls because the Project does not propose uses or components requiring additional fire, emergency medical services, or police services. The Project would neither induce population growth nor require the construction, expansion, or physical alteration of existing government facilities (fire, police, school, or other public facilities). The onshore work area for JUS S9 Montaña is 2.3 miles from an existing fire station and the Project would not impact fire response times. Therefore, there would be no impact.

3.16.4 Mitigation Summary

The Project would have no significant impact to public services; therefore, no mitigation is required.

3.17 RECREATION

RECREATION	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒
c) Would the project interfere with existing use of offshore recreational boating opportunities?[10]	☐	☒	☐	☐

3.17.1 Environmental Setting

3.17.1.1 JUS S9 Montaña – San Luis Obispo County

Project activities are within and offshore of Montaña de Oro State Park. As discussed in *Section 3.16, Public Services*, Montaña de Oro State Park covers 8,000 acres and offers picnic and beach areas, camping, biking, hiking,

[10] The CSLC has chosen to analyze this impact in addition to the impact analyses set forth in CEQA Guidelines Appendix G. Though use of the Appendix G checklist meets the requirements for an IS, "public agencies are free to devise their own format" (CEQA Guidelines § 15063, subd. (f)).

horseback riding, fishing, scuba diving/snorkeling, and windsurfing/surfing (State Parks 2025a). Montaña de Oro State Park receives over 500,000 visitors per year, peaking in the summer months (State Parks 2012). Vessels launching from Montaña de Oro State Park likely launch from the Spooners Cove Beach parking lot and consist of recreational boaters and small watercraft such as kayaks and stand-up paddle boards. The closest public boat launch ramp is located near Tidelands Park in Morro Bay, approximately 4.2 miles north of the onshore work area. The closest San Luis Obispo County park is Los Osos Community Park, located at 2180 Palisades Avenue in Los Osos, approximately 2.2 miles northeast of the onshore work area.

3.17.1.2 JUS S9 Manchester and JUS S8 – Mendocino County

Project activities are offshore of Manchester State Park. Manchester State Park covers 760 acres and offers picnic and beach areas, camping, biking, hiking, boating, fishing, scuba diving/snorkeling, and windsurfing/surfing (State Parks 2025b). Only occasional recreational boating occurs in the area as Manchester State Park lacks beach areas to launch small watercraft and the closest launching area is located at the Noyo River boat launch parking lot, approximately 29.9 miles north. The closest Mendocino County park is Faulkner Park, located at 20400 Mountain View Road in Boonville, approximately 16.5 miles east of the most shoreward point of the offshore work area.

3.17.2 Regulatory Setting

State laws and regulations pertaining to recreation and relevant to the Project are identified in Appendix A. At the local level, applicable policies and programs ae included in Appendix B.

3.17.3 Impact Analysis

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

(a and b) No Impact

The Project would not result in population growth in the area or otherwise result in the increased use of existing recreational facilities. The Project also does not include construction of any recreational facilities and would not require the construction or expansion of recreational facilities. While the onshore work activities would temporarily restrict partial use of the Sandspit parking lot by removing six parking spaces from visitor use for 3.5 days, these activities would not hinder access to onshore or offshore recreational sites, including beach access, which is accessible from Montaña de Oro State Park. Offshore, JUS S9 Montaña as well as JUS S9 Manchester and JUS S8 work activities would occur over 3,000 feet offshore and would not impact any existing recreational facilities or beach access. Therefore, there would be no impact.

c) Would the project interfere with existing use of offshore recreational boating opportunities?

Less than Significant with Mitigation

Offshore recreational activities (i.e., pleasure boating, recreational fishing, and kayaking) in the vicinity of the cable removal routes may be affected during Project work activities. However, the Project's offshore work activities would be short-term and spatially limited to the conduit exit points, cable alignments, and potentially a wet storage area. Given the temporary nature of the Project work activities, the fact that vessels would be stationary or slow-moving, and the availability of large open marine areas nearby, recreational boaters and fishers would be able to navigate around the offshore work areas with minimal disruption. **MM REC-1** and **MM REC-2** would further reduce recreational vessel conflicts by requiring coordination with local marinas and USCG to provide adequate notice to vessels about the planned activity timeframe and need for caution around the work area. With implementation of these measures, the impact would be less than significant.

MM REC-1: Advanced Local Notice to Mariners. At least 15 days prior to initiation of Project work activities at each location, a Local Notice to Mariners (www.dco.uscg.mil/Featured-Content/Mariners/Local-Notice-to-Mariners-LNMs/Southwest-District/) shall be submitted the U.S. Coast Guard (USCG) (www.pacificarea.uscg.mil/Our-Organization/Southwest-District/Prevention-Division/LnmRequest/)/and posted to the USCG for the following marine activities:

1 Starting offshore cable removal activities

2 Any Project-related marine work impacting the users in the Pacific Ocean

A copy of the published notice shall be provided immediately to CSLC. The Notice shall include the following:

- The requirements of the U.S. Submarine Cable Act (47 U.S.C. section 25) for anglers to avoid deploying gear within 1 nautical mile (nm) of a vessel engaged in cable installation and within 0.25 nm of a buoy marking the location of a cable.
- The location of Project work areas, including cable route coordinates.
- The size and type of equipment that will be performing the work, and any distinguishing marks or flags that will enable boaters to identify the vessels.
- The name and radio call signs for working vessels.
- 24-hour telephone numbers of on-site contact representatives.
- The schedule for completing the Project.

The Applicant will provide this information directly to the Harbormaster at Morro Bay, Point Arena Harbor, and the Morro Bay, Port San Luis, and Manchester Commercial Fishermen's Associations, other local anglers who request it, and to the Cable Multi-Agency Coordinating Committee.

MM REC-2: Advanced Notice to Ocean Users. The Applicant shall submit to CSLC and post public notices at least 30 days prior to initiation of Project work activities at the following locations:

1 Montaña de Oro State Park

2 Manchester State Park

A copy of the published notice shall be provided immediately after posting to CSLC. The Notice shall include the following:

- A location map of Project work areas, including cable route coordinates.
- The size and type of equipment, and photos of the vessels, that will be performing the work as well as any distinguishing marks or flags that will enable ocean recreational users to identify the vessels.
- 24-hour telephone numbers of on-site contact representatives.
- The Project's activity schedule at and/or offshore of each State Park.

3.17.4 Mitigation Summary

Implementation of the following mitigation measures would reduce the potential for Project-related impacts to recreation to less than significant.

- **MM REC-1: Advanced Local Notice to Mariners**
- **MM REC-2: Advanced Notice to Ocean Users**

3.18 TRANSPORTATION

TRANSPORTATION – Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☒	☐	☐
b) Conflict or be inconsistent with State CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

3.18.1 Environmental Setting

Montaña de Oro State Park gets over 500,000 visitors per year, peaking in the summer months (State Parks 2012), and Pecho Valley Road, the main road for visitor traffic, supports many thousands of average daily trips. The JUS S9 Montaña onshore work area (the Sandspit parking lot) would be accessed from Sandspit Road via Pecho Valley Road. There are no transit facilities in or near the onshore work area.

In the Montaña de Oro offshore area and along most of the central California coast between San Francisco and Point Conception, shipping lanes have not been established. Vessel traffic in the JUS S9 Montaña offshore area would likely consist of commercial fishing vessels and recreational boaters. Marine traffic activity along the California coast offshore of Manchester State Park includes all types of vessels: tankers, container ships, bulk carriers, military vessels, research

vessels, cruise ships, tugs and tows, registered fishing vessels, and other types of commercial vessels. Navigation practice has produced a pattern of traffic flow at various distances from shore based on transit direction, vessel type, and cargo. CARB regulates the distance cargo vessels must travel from shore under its Ocean-Going Vessels Fuel Regulation. This regulation mandates that ships switch to cleaner, low-sulfur fuel when they are within 24 nm of the California coastline; therefore, it is common that larger vessels, such as cargo ships that use high-sulfur fuel, will maintain a distance of at least 24 nm from shore. Slower-going ocean tank barges currently transit the central coast approximately 15 to 25 nm (28 to 46 kilometers) from shore to minimize interaction with the oil tankers farther out and the speedier container ships closer to shore.

The nearest marina services to the JUS S9 Montaña work area are at the Morro Bay State Park Marina in Morro Bay, which is located approximately 3.5 miles to the north. Neither Point Arena nor Manchester State Park has a marina or even a public boat launch. The nearest marina services to the JUS S9 Manchester and JUS S8 work area are at the Dolphin Isle Marina in Fort Bragg, which is located approximately 31 miles to the north.

3.18.2 Regulatory Setting

Federal and state laws and regulations pertaining to transportation and relevant to the Project are identified in Appendix A. At the local level, no goals, policies, or regulations related to transportation are applicable to the Project. Emergency access requirements are established in the San Luis Obispo County Fire Regulations, which combine California state codes with local requirements for fire prevention and safety.

Vehicle Miles Traveled

Under SB 743, automobile delay, as measured by level of service or similar metrics, is no longer considered a significant environmental impact under CEQA. CEQA Guidelines section 15064.3 identifies vehicle miles traveled (VMT) as the appropriate measure of transportation impacts. The intent of this new measure is aimed at promoting the reduction of GHG emissions and the development of multimodal transportation networks. This policy direction is reflected in the County of San Luis Obispo Transportation Impact Analysis Guidelines, which includes a VMT program and a screening tool for evaluating VMT impacts, and regional transportation planning documents such as SLOCOG's 2023–2045 RTP/SCS (SLOCOG 2023). Cities and counties throughout

California are in the process of implementing the transition from level of service to VMT.

As the intent behind SB 743 is to reduce GHG emissions from passenger and commercial cars and trucks and to promote multimodal transportation networks, the offshore vessel work trips would not be relevant and are not discussed further in this Transportation section.

3.18.3 Impact Analysis

a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less than Significant with Mitigation

The Project would not conflict with existing or planned onshore circulation systems near Montaña de Oro State Park. The JUS S9 Montaña onshore work area would be served by existing roadway facilities and would not change vehicular, pedestrian, or bike traffic on roadways. Onshore work activities for JUS S9 Montaña would be confined to the Sandspit parking lot and would require minimal equipment and personnel, which would be transported to the site via two crew trucks. There would be no onshore Project activities for JUS S9 Manchester and JUS S8, so traffic patterns along Kinny Road would be unaffected. Therefore, there would be no impact.

Offshore Project work activities would result in negligible, short-term (31 days) impacts to offshore circulation and traffic patterns (see Table 2-1 for vessel operations, including the number of days for DSV and CRV activities), which include both shallow, coastal waters and open water offshore Montaña de Oro and Manchester State Parks. Project vessels and the associated cable removal activities may briefly increase marine traffic in the immediate area during operations in both locations. While Project vessel operators would comply with international vessel traffic and USCG navigation regulations, **MM REC-1** (Advanced Local Notice to Mariners) would require coordination with local marinas and USCG to provide adequate notice to vessels about the planned activity timeframe and locations. With implementation of this measure, the impact would be less than significant.

b) Conflict or be inconsistent with State CEQA Guidelines section 15064.3, subdivision (b)?

Less than Significant Impact

Because the Project is not a land use or a transportation project, CEQA Guidelines section 15064.3(b)(3) identifies that "…(f)or many projects, a qualitative analysis of construction traffic may be appropriate." As such, this IS/MND provides a qualitative analysis of the Project's onshore construction traffic.

During Project activities, up to three light-duty trucks would be traveling daily to the onshore work area from nearby residences, hotels, or rental properties. These Project-related trips would generate VMT, but the Project's construction activities and related trips would only last for 3.5 days (see *Section 2.8, Project Equipment and Personnel*). Therefore, the impact would be less than significant.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact

Primary access to the JUS S9 Montaña onshore work area would be accomplished from existing public roads. Onshore Project work activities do not include any improvements to public roads or rights-of-way or any incompatible work equipment. Therefore, there would be no impact.

Cable removal activities (*Sections 2.4 and 2.5*) could interfere with local marine vessel traffic, including commercial and recreational fishing operations (*Section 4.2*). Cable removal activities and the presence of the Project vessel spread may increase marine traffic in the immediate transitory work areas of the vessels during the short duration of the operations in both locations. However, Project vessels and marine traffic generated by the Project are not an incompatible use in the Pacific Ocean and would be consistent with commercial fishing boats, cruise ships, and other large vessels that travel through the Project area. Additionally, Project related vessel operators must comply with international vessel traffic and USCG navigation regulations that minimize interference and ensure safe offshore work activities. Therefore, there would be no impact.

d) Result in inadequate emergency access?

No Impact

An impact analysis related to emergency vehicle access is only relevant for the JUS S9 Montaña onshore work activities, which would comply with all San Luis Obispo County regulations and would not interfere with implementation of the San Luis Obispo County MJHMP (County of San Luis Obispo 2025b) or other emergency services (see *Section 3.18.2*). As discussed in b), above, onshore work activities would be confined to the Sandspit parking lot and would require minimal equipment and personnel. As such, emergency access to the Sandspit parking lot and along Pecho Valley Road would be maintained during Project work activities. Therefore, there would be no impact.

3.18.4 Mitigation Summary

Implementation of the following mitigation measure would reduce the potential for Project-related impacts due to transportation to less than significant.

- **MM REC-1: Advanced Local Notice to Mariners**

3.19 UTILITIES AND SERVICE SYSTEMS

UTILITIES AND SERVICE SYSTEMS – Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☐	☒
c) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

UTILITIES AND SERVICE SYSTEMS – Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

3.19.1 Environmental Setting

3.19.1.1 JUS S9 Montaña – San Luis Obispo County

Non-hazardous solid waste in San Luis Obispo County is currently disposed of at Santa Maria Transfer Station, Buckeye Processing, Cold Canyon Landfill, Chicago Grade Landfill, and Paso Robles Landfill (San Luis Obispo County Integrated Waste Management Authority 2025). The closest landfill to the JUS S9 Montaña onshore work area is the Cold Canyon Landfill, which has 13,000,000 cubic yards of remaining capacity as of August 2020 (CalRecycle 2025).

3.19.1.2 JUS S9 Manchester and JUS S8 – Mendocino County

Non-hazardous solid waste in Mendocino County is currently disposed of at ten transfer stations throughout Mendocino County, with a final destination at a landfill located outside of Mendocino County (County of Mendocino 2008). The closest transfer station to the Manchester JUS S8 and JUS S9 offshore work area is the South Coast Transfer Station.

3.19.2 Regulatory Setting

Federal and state laws and regulations pertaining to utilities and service systems and relevant to the Project are identified in Appendix A. At the local level, no goals, policies, or regulations relevant to utilities and service systems are applicable to the Project.

3.19.3 Impact Analysis

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

c) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?

(a to c) No Impact

The Project would not involve relocation or construction of new water or wastewater treatment, stormwater drainage, electrical power, natural gas, or telecommunication facilities. The Project would not require water for cable removal activities. As such, the Project would also not require new or expanded water supplies, facilities, or wastewater treatment services. Therefore, there would be no impact.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

(d and e) Less than Significant Impact

Solid waste generated by the Project would include the recovered cables from all cable routes as well as the cable anchors excavated during JUS S9 Montaña offshore activities. The fiber optic cables would be recycled following transport by the CRV to a mechanical dismantling/recycling facility (see *Section 2.6, Demobilization and Recycling*) and cable anchors recovered from the JUS S9 Montaña offshore work area would be disposed of at an approved facility that is not known at the time of IS/MND publication. However, each cable anchor weighs approximately 21 pounds, with a maximum dimension of 17.25 inches, and the disposal of these anchors would not be expected to exceed the capacity of the Cold Canyon Landfill. Therefore, the impacts would be less than significant.

3.19.4 Mitigation Summary

The Project would have no significant impact to utilities and service systems; therefore, no mitigation is required.

3.20 WILDFIRE

WILDFIRE - Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

JUS S9 Montaña requires an onshore work area. JUS S9 Manchester and JUS S8 do not require an onshore work area. Therefore, the IS/MND will only focus on Wildfire information relevant to the onshore work area in San Luis Obispo County.

3.20.1 Environmental Setting

According to CAL FIRE Fire Hazard Severity Zone maps, the JUS S9 Montaña onshore work area is located within a Very High Fire Hazard Severity Zone in a state responsibility area (CAL FIRE 2025). The state adopted the updated state responsibility area Fire Hazard Severity Zone maps on April 1, 2024. Fire suppression services for the onshore work area would be provided by the San Luis Obispo County Fire Department, as described in *Section 3.16, Public Services*.

Topography and terrain influence fire risk by affecting fire spread rates. Typically, and in the absence of wind, steep terrain results in faster fire spread up-slope and slower fire spread down-slope. Flat terrain tends to have little effect on fire spread, resulting in fires that are driven by wind. The onshore work area is within a flat parking lot that is paved with asphalt.

3.20.2 Regulatory Setting

Federal and state laws, regulations, and policies pertaining to wildfire and relevant to the Project are identified in Appendix A. At the local level, no goals, policies, or regulations related to wildfires are applicable to the Project.

3.20.3 Impact Analysis

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment?

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

(a through d) No Impact

The Project activities in the onshore work area are limited to cable cutting activities in the Sandspit parking lot (*Section 2.4.2*) and would not conflict with or

impair the San Luis Obispo County MJHMP (County of San Luis Obispo 2025b). In addition, the Project does not propose physical changes such as realigned or closed-off roadways or changes in general transportation circulation and access that would interfere or impair emergency response or evacuation.

The Sandspit parking lot is paved, flat, and unvegetated, conditions that present a low risk of wildfire. The Project has no known factors that would exacerbate wildfire risks during onshore work, as cable cutting would take place within the utility access point (*Section 2.4.2*) and the work crew would control any sparks from the circular saw used to cut the cable via standard Occupational Safety and Health Administration worker protection requirements.

The Project work activities would not require or result in the relocation or construction of new or expanded utilities (see *Section 3.19, Utilities and Service Systems*), and, as the Project involves decommissioning and removal, there would be no risk to people or structures from any increased fuel or new potential ignition sources (such as overhead power lines) in proximity to wildland areas. For discussions on emergency response plans, emergency evacuations, and fire risk see *Sections 3.10, Hazards and Hazardous Materials, and 3.18, Transportation*. Therefore, there would be no impact.

3.20.4 Mitigation Summary

The Project would have no significant impact related to wildfire; therefore, no mitigation is required.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

The lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur. Where prior to commencement of the environmental analysis a project proponent agrees to mitigation measures or project modifications that would avoid any significant effect on the environment or would mitigate the significant environmental effect, a lead agency need not prepare an EIR solely because without mitigation the environmental effects would have been significant (per CEQA Guidelines, § 15065).

MANDATORY FINDINGS OF SIGNIFICANCE –	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are	☐	☐	☒	☐

MANDATORY FINDINGS OF SIGNIFICANCE –	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present, and probable future projects)?				
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

3.21.1 Impact Analysis

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Less than Significant with Mitigation

The potential for the Project to impact biological resources, including environmental quality and the viability of sensitive species and habitats, has been thoroughly evaluated. As discussed in *Section 3.4, Biological Resources*, the Project would not result in significant adverse effects on fish or wildlife habitat, would not lead to population declines below self-sustaining levels, and would not threaten the continued existence of plant or animal communities or reduce the range or number of endangered, rare, or threatened species.

With implementation of **MM BIO-1** through **MM BIO-7** (*Section 3.4, Biological Resources*), along with **MM HAZ-1** and **MM HAZ-2** (*Section 3.10, Hazards and Hazardous Materials*), minor, temporary, and localized impacts to special status species and their habitats would be reduced to less than significant.

The Project has been evaluated for its potential to eliminate important examples of major periods of California history or prehistory. The Project's potential impacts on historic and archaeological resources are addressed in *Section 3.5, Cultural Resources, and Section 3.6, Cultural Resources – Tribal*. A review of cultural resources records indicates that although the JUS S9 Montaña onshore work area is within the boundaries of a previously recorded cultural resource, the resource has previously been evaluated and determined to be ineligible for listing on the NRHP. As such, impacts to cultural and Tribal Cultural Resources are considered unlikely. However, to address the potential for previously undiscovered resources, implementation of **MM CUL-1**, **MM CUL-2** and **MM TCR-1** would reduce any such impacts to less than significant.

b) Does the project have impacts that would be individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less than Significant Impact

As detailed in this IS/MND, the Project has the potential to result in significant impacts to the following environmental resource areas: Air Quality (*Section 3.3*), Biological Resources (*Section 3.4*), Cultural Resources (*Section 3.5*), Cultural Resources – Tribal (*Section 3.6*), Hazards and Hazardous Materials (*Section 3.10*), Hydrology and Water Quality (*Section 3.11*), Recreation (*Section 3.17*), and Transportation (*Section 3.18*). However, mitigation measures have been identified that would reduce all of the Project's potentially significant impacts to less-than-significant levels.

For a Project-related impact to contribute to a cumulatively significant effect, it must occur in conjunction with impacts from past, present, or reasonably foreseeable future projects that affect the same resource area, occur within a similar timeframe, or overlap geographically with the proposed Project.

Based upon a query of San Luis Obispo County and Mendocino County databases, as well as searches of the Office of Land Use and Climate Innovation's State Clearinghouse CEQAnet, no projects were identified that would result in a cumulative impact to the environment (County of Mendocino 2026a, 2026b; County of San Luis Obispo 2026a, 2026b; LCI 2026). While CSLC has received three applications related to other fiber optic cable projects in the vicinity of the JUS S9 Montaña offshore work area, at the time of IS/MND

publication, none of these projects have been assessed or approved by CSLC, and there is no date for CSLC consideration or project start date. Therefore, none of these projects will occur at the same time as the JUS S9 Montaña Project.

When considering the Project impacts in combination with effects of past projects, other current projects, and probable future projects, the Project's impacts would not be cumulatively considerable.

c) Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant with Mitigation

The Project's potential impacts on human beings are evaluated throughout Sections 3.1 through 3.20 of this IS/MND. These analyses include potential effects on resources used or valued by the public, residents, and visitors (such as aesthetics, public services, and recreation); resources related to public health and safety (such as air quality, geology and soils, GHG emissions, and water quality); and elements influencing community character and essential services (such as land use, population and housing, transportation, and utilities and service systems). None of the analyses identified adverse effects that could not be avoided or reduced to a less-than-significant level through implementation of the proposed mitigation measures or compliance with applicable regulations. Therefore, with mitigation in place, Project impacts would be less than significant.

4.0 OTHER CALIFORNIA STATE LANDS COMMISSION CONSIDERATIONS

In addition to the environmental review required pursuant to CEQA, a public agency may consider other information and policies in its decision-making process. This section presents information relevant to CSLC's consideration of the Project. The considerations addressed below are:

- Climate change and sea level rise
- Commercial and recreational fishing
- Environmental justice
- Significant Lands Inventory
- Other considerations may be addressed in the staff report presented at the time of CSLC's consideration of the Project.

4.1 CLIMATE CHANGE AND SEA LEVEL RISE

Climate change is having and will continue to have widespread impacts on California's environment, water supply, energy consumption, public health, and economy. Many impacts already occur, including increased fires, floods, severe storms, and heat waves (LCI 2018). Documented effects of climate change in California include increased average, maximum, and minimum temperatures; decreased spring runoff to the Sacramento River; shrinking glaciers in the Sierra Nevada; sea level rise at the Golden Gate Bridge and in San Francisco Bay; warmer temperatures in Lake Tahoe, Mono Lake, and other major lakes; and plant and animal species found at changed elevations (LCI 2018).

The climate crisis and rising sea levels are impacting coastal California now. As underscored in the State of California Sea Level Rise Guidance (Ocean Protection Council 2024), the combination of extreme weather events and the persistent and accelerating rise in sea levels will lead to increased coastal hazards, such as wave runup, storm surges, flooding, and erosion. Shorelines will move inland due to rising seas, exposing more of the natural and human-built environment to coastal hazards. The resulting damage will occur repeatedly and incrementally over years and, in extreme cases, over the span of a few large winter storms. However, the cable decommissioning activities are anticipated to take place outside of storm season and for a very limited time, from July through September 2026, and the Project is therefore unlikely to be affected by coastal climate change impacts, such as sea-level rise, wave

runup, persistent flooding, and erosion. The cable conduits that will remain in place after the Project is completed are buried at a maximum depth of 70 feet below the ground and will not be subject to climate change impacts.

4.2 COMMERCIAL AND RECREATIONAL FISHING

JUS S9 Montaña – San Luis Obispo County

Commercial fisheries within the Montaña de Oro area include species that range from invertebrates such as crab and shrimp to sharks and various finfish species. Fishing Block 615 encompasses the JUS S9 Montaña offshore work area. Gear types that are utilized to harvest commercial fishery resources in shallow, coastal waters include traps, diving, round-haul nets, and hook and line, whereas fisheries further offshore are using traps or pots, gillnets, and longlines or set line (Padre 2024). The locations, depths, and times of year in which gear is used to fish varies due to limitations in the gear, distribution of the target species, and regulations such as open seasons and quotas. Morro Bay and Port San Luis are the two closest ports that provide primary ocean access for commercial fishing vessels.

Recreational fishing and charter vessels use local harbors, including Morro Bay and Avila Bay, and commonly fish within 3 nm of the shore within the region. The rocky areas of Point Buchon, 3.5 miles (5.6 kilometers) south of the conduit exit location, are trafficked by recreational anglers, private boats, and kayakers targeting a variety of species such as lingcod, rockfish, cabezon, petrale sole, starry flounder, California halibut, and white seabass.

JUS S9 Manchester and JUS S8 – Mendocino County

Commercial fishing in the vicinity of the JUS S9 Manchester and JUS S8 offshore work area targets a variety of species ranging from invertebrates such as crab and shrimp to finfish and sharks. Fishing Block 402 encompasses the JUS S9 Manchester and JUS S8 offshore work area. Gear types used to harvest these resources include trawl, gill net, trap, diving, round-haul nets, and hook-and-line. Commercial fishing in the JUS S9 Manchester and JUS S8 offshore work area primarily involves trawl, trap, diving, and hook-and-line (Padre 2024). The locations, depths, and time of year fished by each gear vary due to limitations in the gear, distribution of target species, and regulations (open seasons and quotas). Vessels that fish in this area are primarily from Fort Bragg and Bodega Bay, although some may come from ports to the north and south.

The primary ports and harbors in the Project vicinity that provide facilities for commercial and recreational vessels, including facilities for landing commercial catch, are Point Arena, Fort Bragg, and Bodega Bay. The number of these vessels operating from ports in the Project area varies by year. Both small and large charter vessels operate out of Fort Bragg and Bodega Bay. Currently, Fort Bragg has at least five, while Bodega Bay has at least eight recreational fishing charters operating in the Project vicinity.

Recreational charter vessels from Bodega Bay and Fort Bragg generally do not fish near Manchester State Park due to the distance (about 45 nm [82 kilometers] from Bodega Bay and about 25 nm [46 kilometers] from Fort Bragg); however, personal fishing vessels could be present during Project activities.

Project Discussion

Cable removal may temporarily impede recreational and commercial fishing in the immediate transitory work area of the vessels during the short duration of Project work activities in both locations. However, a Notice to Mariners and Notice to Ocean Users would be posted describing the nature, location, and duration of cable recovery activities. There may be a temporary loss of fishing ground for the duration of the Project; however, recreational and commercial fishing access will return to normal after Project vessels have left the areas. Cable removal will also permanently eliminate any potential impacts to fishing operations in the future (e.g., potential economic losses due to avoiding fishing over cables or damage to gear entangled with cables) for the portion of cables currently located between the shore to 1,000 fathoms offshore (see *Section 1.4* for discussion on cable removal out to 1,000 fathoms).

The Project contractor, Mertech Marine, has prepared and will implement a Fisheries Management Plan as part of the Project (Padre 2024). The Fisheries Management Plan identifies impact avoidance measures to reduce conflicts with anglers during Project activities as well as impacts to fish habitat.

4.3 ENVIRONMENTAL JUSTICE

Environmental justice is defined by California law as "the fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins, with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies" (Government Code section 65040.12(e)). This definition is consistent with the Public Trust Doctrine principle that the management of trust lands is for the benefit of all

people. The CSLC adopted an Environmental Justice Policy in December 2018 (Item 75) to ensure that environmental justice is an essential consideration in CSLC's processes, decisions, and programs (CSLC 2018). Through its policy, the CSLC reaffirms its commitment to an informed and open process in which all people are treated equitably and with dignity, and in which its decisions are tempered by environmental justice considerations. Among other goals, the policy commits the CSLC to, "Strive to minimize additional burdens on and increase benefits to marginalized and disadvantaged communities resulting from a proposed project or lease" (CSLC 2018).

4.3.1 U.S. Census Bureau Statistics

Table 4-1 and Table 4-2 present income, employment, and race data for the state, county, and local study area in the JUS S9 Montaña and JUS S9 Manchester and JUS S8 vicinities, respectively, based on the most recently available information from the U.S. Census Bureau's 2023 American Community Survey 1-Year and 5-Year Estimates Data Profiles (U.S. Census Bureau 2023a, 2023b, 2023c, 2023d, 2023e, 2023f). The JUS S9 Montaña local study area is Census Tract 130, which covers the coastal portion of unincorporated San Luis Obispo County, south of the county line to the southern Montaña de Oro State Park boundary. The JUS S9 Manchester and JUS S8 local study area is Census Tract 111.02, which covers the coastal portion of unincorporated Mendocino County south of the unincorporated community of Elk and north of the county line.

4.3.2 Population and Economic Characteristics

JUS S9 Montaña – San Luis Obispo County

This Census Tract has an estimated population of 2,465(U.S. Census Bureau 2023a). Households in this Census Tract have below-average income levels ($77,988) compared to San Luis Obispo County ($90,670) and California as a whole ($95,521) (Table 4-1). The percentage of residents living below the poverty line in Census Tract 130 is lower than in San Luis Obispo County and California overall.

By income, 8.3 percent of residents in Census Tract 130, 13.5 percent of residents in San Luis Obispo County, and 12.0 percent of people in California are living below the poverty line (Table 4-1). Therefore, the population of Census Tract 130 does not appear to be disproportionately burdened by poverty compared to San Luis Obispo County and California as a whole.

By race, 67.5 percent of the residents in Census Tract 130 identify as "White" and 25.5 percent identify as "Hispanic". In comparison, 65.4 percent of residents in San Luis Obispo County and 33.3 percent of people in California identify as "White" and 24.5 percent of residents in San Luis Obispo County and 40.5 percent of people in California identify as "Hispanic." Residents that identify as "Black," "Native," "Asian," "Islander," "Other Race", and "Two or more races" make up approximately 7.1 percent of residents in Census Tract 130, 10.1 percent of residents in San Luis Obispo County, and 26.4 percent of people in California as a whole. If the minority population in Census Tract 130 was over 50 percent, further analysis would be appropriate according to the Council on Environmental Quality. No aspect of the Project would disproportionately affect low-income or minority populations.

JUS S9 Manchester and JUS S8 – Mendocino County

This Census Tract has an estimated population of 4,966(U.S. Census Bureau 2023e). Households in this Census Tract have above-average income levels ($95,397) compared to Mendocino County ($67,454) and is similar to California as a whole ($95,521) (Table 4-2). The percentage of residents living below the poverty line in Census Tract 111.02 is lower than in Mendocino County and California overall.

By income, 9.3 percent of residents in Census Tract 111.02, 12.3 percent of residents in Mendocino County, and 12.0 percent of people in California are living below the poverty line (Table 4-2). Therefore, the population of Census Tract 111.02 does not appear to be disproportionately burdened by poverty compared to Mendocino County and California as a whole.

By race, 56.5 percent of the residents in Census Tract 111.02 identify as "White" and 31.6 percent identify as "Hispanic." In comparison, 62.1 percent of residents in Mendocino County and 33.3 percent of people in California identify as "White" and 26.9 percent of residents in Mendocino County and 40.5 percent of people in California identify as "Hispanic." Residents that identify as "Black," "Native," "Asian," "Islander," "Other Race," and "Two or more races" make up approximately 11.9 percent of residents in Census Tract 111.02, 10.9 percent of residents in Mendocino County, and 26.4 percent of people in California as a whole. If the minority population in Census Tract 111.02 was over 50 percent, further analysis would be appropriate according to the Council on Environmental Quality. No aspect of the Project would disproportionately affect low-income or minority populations.

4.3.3 California Office of Environmental Health Hazard Assessment CalEnviroScreen Results

JUS S9 Montaña – San Luis Obispo County

According to the California Communities Environmental Health Screening Tool (CalEnviroScreen 4.0) data last updated in 2021, this tract, has a population characteristics (vulnerability) score in the 10th percentile, which represents unemployment, educational attainment, linguistic isolation, housing burden and poverty components that could result in increased pollution vulnerability (OEHHA 2021). The existing pollution burden for this tract is in the 30th percentile, with impaired waters and solid waste as factors with the highest scores. In addition, the population is 73 percent white/non-minority and has low scores for public health concerns such as asthma, low birth rate, and cardiovascular disease (e.g., heart attacks).

Table 4-1. Environmental Justice Statistics – JUS S9 Montaña

Subject	California	San Luis Obispo County	Census Tract 130
Income and Population			
Total Population	38,965,192	281,639	2,468
Median Household Income	$95,521	$90,670	$77,988
Percent below the poverty line	12.0	13.5	8.3
Employment by Industry (by percentage			
Agriculture, forestry, fishing and hunting, mining	2.0	3.3	8.8
Construction	6.7	7.6	6.5
Manufacturing	8.9	8.0	2.8
Wholesale trade	2.5	1.5	3.3
Retail trade	10.1	10.8	5.7
Transportation and warehousing, and utilities	6.0	4.8	2.9
Information	2.9	1.7	1.4
Finance and insurance, and real estate and rental and leasing	5.7	4.4	5.5
Professional, scientific, and management, and administrative and waste management services	14.3	12.0	7.1

Table 4-1. Environmental Justice Statistics – JUS S9 Montaña

Subject	California	San Luis Obispo County	Census Tract 130
Educational services and health care and social assistance	21.7	22.6	26.0
Arts, entertainment, and recreation, and accommodation and food services	9.5	12.7	21.2
Other services, except public administration	4.8	4.9	6.9
Public administration	4.7	5.6	1.8
Race (by percentage)			
White	33.3	65.4	67.5
Black	5.2	1.1	0.0
Native	0.3	0.2	0.0
Asian	15.5	3.4	2.6
Islander	0.3	0.2	0.0
Other	0.7	0.6	0.0
Two	4.4	4.6	4.5
Hispanic	40.5	24.5	25.5

Sources: U.S. Census Bureau 2023a, 2023b, 2023c, 2023d.

JUS S9 Manchester and JUS S8 – Mendocino County

According to the California Communities Environmental Health Screening Tool (CalEnviroScreen 4.0) data last updated in 2021, this tract, has a population characteristics (vulnerability) score in the 25th percentile, which represents unemployment, educational attainment, linguistic isolation, housing burden and poverty components that could result in increased pollution vulnerability (OEHHA 2021). The existing pollution burden for this tract is in the 16th percentile, with groundwater threats and solid waste as factors with the highest scores. In addition, the population is 71.82 percent white/non-minority and has low to moderate scores for public health concerns such as asthma, low birth rate, and cardiovascular disease (e.g., heart attacks).

Table 4-2. Environmental Justice Statistics – JUS S9 Manchester and JUS S8

Subject	California	Mendocino County	Census Tract 111.02
Income and Population			
Total Population	38,965,192	89,108	4,966
Median Household Income	$95,521	$67,454	$95,397
Percent below the poverty line	12.0	12.3	9.2
Employment by Industry (by percentage			
Agriculture, forestry, fishing and hunting, mining	2.0	5.5	4.9
Construction	6.7	7.4	11.3
Manufacturing	8.9	7.4	5.8
Wholesale trade	2.5	2.1	0.8
Retail trade	10.1	11.8	6.8
Transportation and warehousing, and utilities	6.0	5.5	7.0
Information	2.9	1.0	4.3
Finance and insurance, and real estate and rental and leasing	5.7	4.3	5.6
Professional, scientific, and management, and administrative and waste management services	14.3	9.3	14.8
Educational services and health care and social assistance	21.7	23.6	18.5
Arts, entertainment, and recreation, and accommodation and food services	9.5	11.4	13.8
Other services, except public administration	4.8	4.6	4.9
Public administration	4.7	6.2	1.4
Race (by percentage)			
White	33.3	62.1	56.5
Black	5.2	0.8	0.1
Native	0.3	2.7	4.7
Asian	15.5	2.2	0.0
Islander	0.3	0.1	0.0

Table 4-2. Environmental Justice Statistics – JUS S9 Manchester and JUS S8

Subject	California	Mendocino County	Census Tract 111.02
Other	0.7	0.7	3.2
Two	4.4	4.4	3.9
Hispanic	40.5	26.9	31.6

Sources: U.S. Census Bureau 2023c, 2023d, 2023e, 2023f.

4.3.4 Conclusion

Because the percentage of individuals designated as living below the poverty line in the affected communities is not disproportionately higher than in the surrounding areas, it does not appear that an environmental justice community would be disproportionately affected by this Project. The Project's work activities would have minor and temporary impacts on nearby residential communities and State Parks visitors such as noise, aesthetics, and recreation, regardless of their socioeconomic make-up.

4.4 SIGNIFICANT LANDS INVENTORY

The Project involves lands identified as possessing significant environmental values within CSLC's Significant Lands Inventory, pursuant to Public Resources Code section 6370 et seq. The JUS S9 Montaña work area is adjacent to Significant Lands Inventory parcel number 40-062-200 (Pacific Ocean, Morro Bay-Crowbar Canyon). The subject lands are classified as use category Class B, which authorizes limited use, with environmental values identified as mostly geological and biological, including fisheries and wildlife and habitat for wildlife support, but also recreational and exceptional. The JUS S9 Manchester and JUS S8 work area is adjacent to Significant Lands parcel number 23-062-500 (Pacific Ocean, ADJ-Arena Rock). The subject lands are classified as use category Class B, which authorizes limited use, with environmental values identified as mostly biological, including critical ecosystems and habitat for wildlife support, but also exceptional (CSLC 2025).

Based on staff review of the Significant Lands Inventory and the CEQA analysis provided in this MND, the Project, as proposed, would not significantly affect those lands and is consistent with the use classification.

5.0 MITIGATED NEGATIVE DECLARATION PREPARATION SOURCES AND REFERENCES

This IS/MND was prepared by the staff of the CSLC's Division of Environmental Science, Planning, and Management (DESPM), with the assistance of Dudek. The analysis in the MND is based on information identified, acquired, reviewed, and synthesized based on DESPM guidance and recommendations.

5.1 CALIFORNIA STATE LANDS COMMISSION STAFF

Alexandra Borack, Assistant Chief, DESPM

Robin Tuohy, Environmental Scientist, DESPM

Marlene Schroeder, Public Land Management Specialist, Land Management Division

Palani Chandrasekaran, Associate Engineer, Mineral Resources Management Division

Yessica Ramirez, Environmental Justice and Tribal Liaison

Lucinda Calvo, Senior Attorney

Nina Trantaphol, Staff Attorney

Fay Pao, Staff Attorney

5.2 SECTION AUTHORS AND REVIEWERS

Mike Henry, Associate Practice Director: Project Director

Michelle Ogburn, CEQA/NEPA Manager: Project Manager

Hayley Rundle, AICP, Environmental Planner III: Section 3.1, Aesthetics; Section 3.2, Agriculture and Forestry Resources; Section 3.10, Hazards and Hazardous Materials; Section 3.12, Land Use and Planning; Section 3.13, Mineral Resources; Section 3.15, Population and Housing; Section 3.16, Public Services; Section 3.17, Recreation; Section 3.19, Utilities and Service Systems; Section 3.20, Wildfire; Section 3.21, Mandatory Findings of Significance; Section 4.3, Environmental Justice; and Section 4.4, Significant Lands Inventory

Andrea Dransfield Kraus, Biologist III: Section 3.4, Biological Resources

Angela Moniz, Archaeologist II: Section 3.5, Cultural Resources, and Section 3.6, Cultural Resources – Tribal

Ryan Brady, Archaeologist Specialist II: Section 3.5, Cultural Resources, and Section 3.6, Cultural Resources – Tribal

Perry Russell, P.G., Senior Geologist: Section 3.8, Geology, Soils, and Paleontological Resources; and Section 3.11, Hydrology and Water Quality

Connor Burke, Environmental Acoustician II: Section 3.14, Noise

Nicholas Lorenzen, Air Resources Specialist III: Section 3.3, Air Quality; Section 3.7, Energy; and Section 3.9, Greenhouse Gas Emissions

Shawna Johnson, Paleontologist II: Section 3.8, Geology, Soils, and Paleontological Resources

Kristin Arakawa, Environmental Planner and Geospatial Analyst: Chapter 1, Project and Agency Information; Chapter 2, Project Description; Section 3.18, Transportation; Section 4.1, Climate Change and Sea Level Rise; and Section 4.2, Commercial and Recreational Fishing

Nathan Reid, Geospatial Analyst: Chapter 1, Project and Agency Information, and Chapter 2, Project Description

5.3 REFERENCES CITED

Barrett, S. A. 1908. The Ethno-geography of the Pomo and Neighboring Indians. University of California Publications in American Archaeology and Ethnology. Vol. 6 No. 1. Pp. 1-332.

Basgall, M. E. 1982. Archaeology and Linguistics: Pomoan Prehistory as Viewed from Northern Sonoma County, California. Journal of California and Great Basin Anthropology 4:3–22.

Basgall, M.E. 1987. Resource Intensification Among Hunter-gatherers: Acorn Economies in Prehistoric California. *Research in Economic Anthropology* 9: 21-52.

Baumhoff, M. A. 1980. The Evolution of Pomo Society. Journal of California and Great Basin Anthropology 2:175–185.

Bean, L.J., and D. Theodoratus. 1978. Western Pomo and Northeastern Pomo. In California, Volume 8, edited by R. F Heizer, pp. 289-305. Handbook of North American Indians. William Sturtevant, general editor. Smithsonian Institution, Washington, DC.

Bennyhoff, J.A. 1950. Californian Fish Spears and Harpoons. University of California Press, Berkeley.

Bennyhoff, J. A. 1994. Central California Augustine: Implications for Norther California Archaeology. In Toward a New Taxonomic Framework for Central California Archaeology: Essays by James A. Bennyhoff and David A. Fredrickson, edited by R. E. Hughes, pp 65–74. Contributions of the University of California Archaeological Research Facility no 52.

Bertrando, E. 2004. Evidence and Models for Late Pleistocene Chronology and Settlement along California's Central Coast. In *Emerging from the Ice Age: Early Holocene Occupations on the California Central Coast,* edited by Ethan Bertrando and Valerie A. Levulett, pp. 93-105. San Luis Obispo County Archaeological Society Occasional Papers No. 17.

California Department of Finance Demographic Research Unit. 2025. California Hard-to-Count Index (2025 edition) and 2020 Census data. Accessed November 2025. https://dru-data-portal-cacensus.hub.arcgis.com/apps/7242f6ba35044f6fac044aba730db64d/explore.

Cal/EPA (California Environmental Protection Agency). 2025. Sites Identified with Waste Constituents above Hazardous Waste Levels Outside the Waste Management Unit. Accessed November 2025. https://calepa.ca.gov/wp-content/uploads/2016/10/SiteCleanup-CorteseList-CurrentList.pdf.

CAL FIRE (California Department of Forestry and Fire Protection). 2025. "Find your Fire Hazard Severity Zone (FHSZ)." Accessed November 2025. https://experience.arcgis.com/experience/5065c998b4b0462f9ec3c6c226c610a9.

CalRecycle (California Department of Resources Recycling and Recovery). 2025. SWIS Facility/Site Activity Details: Cold Canyon Landfill, Inc. (40-AH-0004). Accessed November 2025. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/5017?siteID=3171.

California Air Pollution Control Officers Association. 2008. CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act. January 2008. Accessed March 2026. https://www.contracosta.ca.gov/DocumentCenter/View/34122/CAPCOA-2008-CEQA-and-Climate-Change-PDF.

Caltrans (California Department of Transportation). 2024. California State Scenic Highway System Map. Accessed November 2025. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.

Carranco, L. and H.L. Sorensen. 1988. Steam in the Redwoods. Caxton Printers.

CARB (California Air Resources Board). 2023. "Area Designation Maps/State and National." November 2023. Accessed December 2025. http://www.arb.ca.gov/desig/adm/adm.htm.

CARB. 2025a. "Ozone & Health." Accessed December 2025. https://ww2.arb.ca.gov/resources/ozone-and-health.

CARB. 2025b. "Nitrogen Dioxide & Health." Accessed December 2025. https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health.

CARB. 2025c. "Carbon Monoxide & Health." Accessed December 2025. https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health.

CARB. 2025d. "Sulfur Dioxide & Health." Accessed December 2025. https://ww2.arb.ca.gov/resources/sulfur-dioxide-and-health.

CARB. 2025e. "Inhalable Particulate Matter and Health (PM2.5 and PM10)." Accessed December 2025. https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm.

CARB. 2025f. "Overview: Diesel Exhaust and Health." Accessed December 2025. https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

Cartier, R. 1993. The Scotts Valley Site: CA-SCR-177. The Santa Cruz Archaeological Society, Santa Cruz.

Castillo, E. D. 1978. The Impact of Euro-American Exploration and Settlement. In California, edited by R. F. Heizer, pp. 289–305, Handbook of North American Indians, Vol. 8, W. G. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

Central Coast RWQCB (Regional Water Quality Control Board). 2024. Water Quality Control Plan for the Central Coastal Basin. Accessed November 2025. https://www.waterboards.ca.gov/centralcoast/water_issues/programs/basin_plan/docs/2024_basin_plan_r3.pdf.

CGS (California Geological Survey). 2002. California Geomorphic Provinces. CGS Note 36. Accessed November 2025.

https://www.conservation.ca.gov/cgs/Documents/Publications/CGS-Notes/CGS-Note-36.pdf.

CGS. 2025a. Fault Activity Map of California. Accessed November 2025. https://maps.conservation.ca.gov/cgs/fam/app/.

CGS. 2025b. Tsunami Hazard Area Map. Accessed November 2025. https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/.

Cochrane, G.R., Cole, A., Sherrier, M., and Roca-Lezra, A. 2022. Bathymetry, backscatter intensity, and benthic habitat offshore of Morro Bay, California (ver. 1.1, January 2024): U.S. Geological Survey data release. https://doi.org/10.5066/P9HEZNRO.

Cohen, K.M., S.C. Finney, P.L. Gibbard, and J.-X. Fan. 2024. The ICS International Chronostratigraphic Chart. Episodes 36: 199-204. https://stratigraphy.org/ICSchart/ChronostratChart2024-12.pdf.

County of Mendocino. 1988. County of Mendocino Coastal Zone Program Map, Map 23 of 31 Maps, Manchester. Accessed November 2025. https://www.mendocinocounty.gov/home/showpublisheddocument/7052/636295845506530000.

County of Mendocino. 2008. General Plan Update Draft Environmental Impact Report. Accessed November 2025. https://www.mendocinocounty.gov/departments/planning-building-services/long-range-plans/current-general-plan.

County of Mendocino. 2021. Mendocino County General Plan Coastal Element. Accessed November 2025. https://www.mendocinocounty.gov/home/showpublisheddocument/56978/638167184738370000.

County of Mendocino. 2026a. "Public Notices." Accessed March 2026. https://www.mendocinocounty.gov/departments/planning-building-services/public-noticing.

County of Mendocino. 2026b. "Environmental Documents." Accessed March 2026. https://www.mendocinocounty.gov/departments/transportation/environmental-documents.

County of San Luis Obispo. 2007. County of San Luis Obispo Local Coastal Program Policy Document. Accessed November 2025.

https://www.slocounty.ca.gov/departments/planning-building/forms-documents/plans-and-elements/elements/coastal-plan-policy.

County of San Luis Obispo. 2010. County of San Luis Obispo Conservation and Open Space Element. Accessed November 2025. https://www.slocounty.ca.gov/departments/planning-building/forms-documents/plans-and-elements/elements/conservation-and-open-space-element/conservation-and-open-space-element.

County of San Luis Obispo. 2011. *County of San Luis Obispo EnergyWise Plan*. Adopted November 22. 2011. Accessed March 2026. https://www.slocounty.ca.gov/departments/planning-building/forms-documents/energy-and-climate-reports/energywise-plan.

County of San Luis Obispo. 2016. *EnergyWise Plan 2016 Update*. Accessed March 2026. https://www.slocounty.ca.gov/departments/planning-building/forms-documents/energy-and-climate-reports/energywise-plan-2016-update.

County of San Luis Obispo. 2025a. Land Use View Map. Accessed November 2025. https://gis.slocounty.ca.gov/Html5Viewer/Index.html?configBase=/Geocortex/Essentials/REST/sites/PL_LandUseView/viewers/PL_LandUseView/virtualdirectory/Resources/Config/Default&layertheme=13.

County of San Luis Obispo. 2025b. San Luis Obispo County Multi-Jurisdictional Hazard Mitigation Plan 2025-2030. Accessed February 2026. https://www.slocounty.ca.gov/departments/administrative-office/office-of-emergency-services/forms-documents/2025-draft-multi-jurisdictional-hazard-mitigation-plan/2025-san-luis-obispo-county-multi-jurisdictional-hazard-mitigation-plan.

County of San Luis Obispo. 2026a. "Active Projects." Accessed March 2026. https://www.slocounty.ca.gov/departments/planning-building/grid-items/active-projects#gsc.tab=0.

County of San Luis Obispo. 2026b. "Current Public Works Projects." Accessed March 2026. https://www.slocounty.ca.gov/departments/public-works/current-public-works-projects.

Coutts, A.D.M., Valentine, J.P., Edgar, G.J., Davey, A., & Burgess-Wilson, B. 2010. *Marine Pollution Bulletin, 60*(9), 1533–1540. https://doi.org/10.1016/j.marpolbul.2010.04.022.

CSLC (California State Lands Commission). 2016. California State Lands Commission Tribal Consultation Policy. Accessed November 2025. https://slcprdwordpressstorage.blob.core.windows.net/wordpressdata/2018/07/Tribal.pdf.

CSLC. 2018. California State Lands Commission Environmental Justice Policy. Accessed November 2025. https://www.slc.ca.gov/wp-content/uploads/sites/355/2018/11/EJPolicy.pdf.

CSLC. 2025. Significant Lands Viewer. Accessed November 2025. https://data.ca.gov/showcase/significant-lands-viewer.

DeGeorgey, A. 2004. A Single Component Paleo-Indian Site in Northern California. In Proceedings of the Society for California Archaeology 17:35–42.

Dibblee, T.W. Dibblee Geologic Map of Morro Bay South Quadrangle. Dibblee Geologic Maps. 2006. Accessed November 2025. https://drive.google.com/file/d/1oYc35mRtYB2KJgb9NQtVtjDUJSo32GIZ/view?pli=1.

Division of Mine Reclamation. 2016. Mines Online. Accessed November 2025. https://maps.conservation.ca.gov/mol/index.html.

DOC (California Department of Conservation). 2022. California Important Farmland Map. Accessed November 2025. https://maps.conservation.ca.gov/DLRP/CIFF/.

DOC. 2024. California Williamson Act Enrollment Finder. Accessed November 2025. https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html.

DTSC (California Department of Substance Control). 2025a. EnviroStor. Accessed November 2025. https://www.envirostor.dtsc.ca.gov/public/.

DTSC. 2025b. Hazardous Waste and Substances "Cortese" List. Accessed November 2025. https://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&reporttype=CORTESE&site_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST.

EIA (U.S. Energy Information Administration). 2025. "Table C2. Energy consumption estimates for selected energy sources in physical units,

2023." Accessed February 2026. https://www.eia.gov/state/seds/sep_sum/html/pdf/sum_use_tot.pdf.

EPA (U.S. Environmental Protection Agency). 2025. "2013 Vessel General Permit and Interim Requirements." Accessed November 2025. https://www.epa.gov/vessels-marinas-and-ports/2013-vessel-general-permit-and-interim-requirements.

Erlandson, J.M. 2011. In Search of a White Bear: An Eccentric Crescent from Sudden Ranch (CA-SBA-208), Northern Santa Barbara County, California. Journal of California and Great Basin Anthropology 31(2): 194–201.

Erlandson, J.M., M.H. Graham, B.J. Bourque, D. Corbett, J.A. Estes, and R.S. Steneck. 2007. The Kelp Highway Hypothesis: Marine Ecology, the Coastal Migration Theory, and the Peopling of the Americas. The Journal of Island and Coastal Archaeology 2(2): 161–174.

FEMA (Federal Emergency Management Agency). 2017. FEMA Flood Map Service Center: Search By Address. Flood map number 06079C1036H, effective, May 16, 2017. Accessed November 2025. https://msc.fema.gov/portal/search#searchresultsanchor.

Fitzgerald, R.T., and T.L. Jones. 1999. The Milling Stone Horizon Revisited: New Perspectives from Northern and Central California. Journal of California and Great Basin Anthropology 21:65-93.

Fitzgerald, R. T., and W. R. Hildebrandt. 2002. "Will the True Age of the Borax Lake Patter Please Stand Up? The Archaeology of CA-HUM-573, An Early Holocene Site on the South End of Pilot Ridge, Humboldt County, California."

Fitzgerald, R.T. and A. Ruby. 1997. Archaeological Test Excavations at CA-SCR-117, the Davenport Landing Site. Garcia and Associates, San Anselmo. Report on file Northwest Information Center, Department of Anthropology, Sonoma State University, Rohnert Park.

Fredrickson, D. A. 1984. The North Coast Region. In California Archaeology, edited by M. J. Moratto, pp 471–527. Academic Press, New York.

Fredrickson, D. A., and T. M. Origer. 2002. Obsidian Hydration in the Borax Lake Basin, Lake County, California. In Essays in California: A Memorial to Franklin Fenenga, edited by W. J. Wallace, and F. A. Riddell, pp. 148–165.

Contributions to the University of California Archaeological Facility 60, Berkeley.

FWARG (Far Western Anthropological Research Group Inc.). 2016. Archaeological Investigations for the Los Osos Wastewater Project, San Luis Obispo County, California. Report on file with the Central Coast Information Center, Santa Barbara Museum of Natural History, Santa Barbara.

Gibson, R.O. 1996. Results of Archaeological Monitoring for Unocal Soil Testing Program along Pipelines near Santa Margarita, San Luis Obispo County, California. Gibson's Archaeological Consulting, Paso Robles. Report submitted to UNOCAL CERT, San Luis Obispo. Copies available from the Central Coast Information Center, Department of Anthropology, University of California, Santa Barbara.

Gifford, E.W., and A.L. Kroeber. 1939. Culture element Distributions, IV: Pomo. University of California Publications in American Archaeology and Ethnology 37(4): 71-100. Berkeley.

Global Marine Systems. 2015a. Japan-US Segment 9 (Morro Bay) California Post Installation Burial Verification Survey 2015. Completion Report. CS Wave Venture & ST204 ROV 07th July 2015- 9th September 2015. August 2015.

Global Marine Systems. 2015b. Japan-US Segment 8 Point Arena California Post Installation Burial Verification Survey 2015. CS Wave Venture & ST204 ROV, 07th July 2015–9th September 2015. August 2015.

Global Marine Systems. 2015c. Japan-US Segment 9 (Manchester) California Post Installation Burial Verification Survey 2015. Completion Report. CS Wave Venture & ST204 ROV, 07th July 2015–9th September 2015. August 2015.

Golla, V. 2007. Linguistic Prehistory. In California Prehistory: Colonization, Culture, and Complexity. Ed. T. Jones and K. Klar. Altamira Press, Lanham, MD.

Greenwood, R.S. 1978. Obispeño and Purisimeño Chumash. In California, Volume 8, edited by R. F Heizer, pp. 520-519. Handbook of North American Indians. William Sturtevant, general editor. Smithsonian Institution, Washington, DC.

Hackel, S. W. 1998. Contested Eden: California Before the Gold Rush. Gutiérrez, R. A., and R. J. Orsi, editors. Published in association with the California Historical Society by University of California Press.

Hildebrandt, W.R. 1984. Late Period Hunting Adaptations on the North Coast of California. *Journal of California and Great Basin Anthropology* 6(2): 189-206.

Hildebrandt, W. R., and V. A. Levulett. 2002. Late Holocene Emergence of Advanced Maritime Cultures in Northwest California. In The Archaeology of the California Coast During the Late Holocene, edited by J. Erlandson and T. L. Jones, pp 303–319. Cotset Institute of Archaeology, University of California, Los Angeles.

Hylkema, M.G. 1991. Prehistoric Native American Adaptations Along the Central California Coast of San Mateo and Santa Cruz Counties. Unpublished Master's thesis, Department of Anthropology, San Jose State University. University Microfilms, Ann Arbor.

IPCC (Intergovernmental Panel on Climate Change). 2007. Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. Edited by S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller. Cambridge, United Kingdom, and New York, New York: Cambridge University Press. Accessed December 2025. https://www.ipcc.ch/site/assets/uploads/2018/05/ar4_wg1_full_report-1.pdf.

IPCC. 2021. Climate Change 2021: The Physical Science Basis. Working Group I Contribution to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change. Edited by V. Masson-Delmotte, P. Zhai, A. Pirani, S.L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M.I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T.K. Maycock, T. Waterfield, O. Yelekçi, R. Yu, and B. Zhou. Cambridge, United Kingdom, and New York, New York: Cambridge University Press. Accessed December 2025. https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_FullReport_small.pdf.

Jefferson, G.T., H.L. Fierstine, J.R. Wesling, and TL. Ku. 1992. Pleistocene Terrestrial Vertebrates from Near Point San Luis, and Localities in San Luis Obispo County, California. Bulletin Southern California Academy of Sciences 91 (1), pp.26-38. https://files.core.ac.uk/download/pdf/19139933.pdf

Jones, T.L. 2003. Prehistoric Human Ecology of the Big Sur Coast, California. Contributions of the University of California Archaeological Research Facility, Berkeley.

Jones, D., and W.R. Hildebrandt. 1990. Archaeological Investigation at Sand Hill Bluff: Portions of Prehistoric Site CA-SCr-7, Santa Cruz County, California. Far Western Anthropological Research Group, Inc., Davis. Copies available from Northwest Information Center, Department of Anthropology, Sonoma State University, Rohnert Park.

Jones, D., and W.R. Hildebrandt. 1994. Archaeological Investigations at Sites CA-SCR-10, CA-SCR-17, CA-SCR-304, and CA-SCR-38/123 for the North Coast Treated Water Main Project, Santa Cruz County, California. Far Western Anthropological Research Group, Inc. Copies available from Northwest Information Center, Department of Anthropology, Sonoma State University, Rohnert Park.

Jones, T.L., and D. Jones. 1992. Elkhorn Slough Revisited: Reassessing the Chronology of CA-MNT-229. Journal of California and Great Basin Anthropology 14:159-179.

Jones, T.L, N.E. Stevens, D.A. Jones, R.T. Fitzgerald, M.G. Hylkema. 2007. The Central Coast: A Midlatitude Milieu. In *California Prehistory: Colonization, Culture, and Complex*, edited by T.L. Jones and K.A. Klar, pp. 125-146. Alta Mira Press, Lanham, MD.

Jones, T.L., J.F. Porcasi, J.W. Gaeta, and B.F. Codding. 2008. The Diablo Canyon Fauna: A Coarse-grained Record of Trans-Holocene Foraging from the Central California Mainland Coast. American Antiquity 73:289–316.

Jones, T.L. and G. Waugh 1995. Central California Coastal Prehistory: A View from Little Pico Creek. Perspectives in California Archaeology No. 3, Institute of Archaeology, University of California, Los Angeles.

Jones, T.L. and J.A. Ferneau 2002a. Prehistory at San Simeon Reef: Archaeological Data Recovery at CA-SLO-179 and -267, San Luis Obispo, California. San Luis Obispo Archaeological Society Occasional Paper No. 16.

Jones, T.L., and J.A. Ferneau. 2002b. Deintensification along the Central Coast. In Catalysts to Complexity: Late Holocene Societies of the California Coast, edited by J.M. Erlandson and T.L. Jones, pp. 205–232. Perspectives in California Archaeology, Vol. 6. Cotsen Institute of Archaeology, University of California, Los Angeles.

Jones, T.L., G. M. Brown, L.M. Raab, J.L. McVickar, W.G. Spaulding, D.J. Kennett, A. York, and P.L. Walker. 1999. Environmental Imperatives Reconsidered:

Demographic Crises in Western North America During the Medieval Climatic Anomaly. Current Anthropology 40:137–170.

LCI (California Governor's Office of Land Use and Climate Innovation). 2018. California's Fourth Climate Change Assessment, Statewide Summary Report. Accessed November 2025. https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf.

LCI. 2026. "CEQAnet Web Portal." Accessed March 2026. https://ceqanet.lci.ca.gov/.

MCAQMD (Mendocino County Air Quality Management District). 2005. *Particulate Matter Attainment Plan*. Accessed March 2026. https://www.co.mendocino.ca.us/aqmd/pdf_files/Attainment%20Plan_DRAFT.pdf.

MCAQMD. 2010. *Adopted Air Quality CEQA thresholds of Significance*. Accessed December 2025. http://www.co.mendocino.ca.us/aqmd/pdf_files/MCAQMDCEQARecomendations.pdf.

MCAQMD. 2013. District Interim CEQA Criteria and GHG Pollutant Thresholds. Accessed December 2025. https://www.co.mendocino.ca.us/aqmd/pdf_files/ceqa-criteria-and-ghg.pdf.

MCOG (Mendocino Council of Governments). 2026. *2026 Mendocino County Regional Transportation Plan & Active Transportation Plan*. Accessed March 2026. https://www.mendocinocog.org/2026-regional-transportation-active-transportation-plan#docaccess-9a8d07c5b56fac47bea56f460f13d5a89c24e27b4e4b7248377a68de7673b603.

McLendon, S, and R.L. Oswalt. 1978. Pomo: Introduction. In California, Volume 8, edited by R. F Heizer, pp. 274-288. Handbook of North American Indians. William Sturtevant, general editor. Smithsonian Institution, Washington, DC.

Mikkelsen, P., W.R. Hildebrandt, and D. Jones. 2000. Prehistoric Adaptations on the Shores of Morro Bay Estuary: Excavations at Site CA-SLO-165, Morro Bay, California. San Luis Obispo County Archaeological Society Occasional Papers 14. San Luis Obispo County Archaeological Society, San Luis Obispo California.

Milliken, R., 1995. A Time of Little Choice: The Disintegration of Tribal Culture in the San Francisco Bay Area, 1769-1810 (No. 43). Ballena Press.

Milliken, R. 2000. Ethnographic Background. In Prehistoric Adaptations on the Shores of Morro Bay Estuary: Excavations at Site CA-SLO-165, Morro Bay, California, edited by P. Mikkelsen, W. Hildebrandt, and D. Jones, pp. 7-18. San Luis Obispo County Archaeological Society Occasional Paper No. 14.

Milliken, R. and J.R. Johnson. 2005. An Ethnogeography of Salinan and Northern Chumash Communities – 1769 to 1810. Far Western Anthropological Research Group, Inc., Davis, California. Submitted to Caltrans District 5, San Luis Obispo, California.

Mills, W.W., M.F. Rondeau, and T.L. Jones. 2005. A Fluted Point from Nipomo, San Luis Obispo County, California. Journal of California and Great Basin Anthropology 25:214-220.

Newsome, S.D., D.L. Phillips, B.J. Culleton, T.P. Guilderson, P. Koch. 2004. Dietary Reconstruction of an Early to Middle Holocene Human Population from the Central California Coast: Insights from Advanced Stable Isotope Mixing Models. Journal of Archaeological Science 31:1101-1115.

North Coast Unified Air Quality Management District. 1995. *Particulate Matter (PM10) Attainment Plan.* Accessed March 2026. https://ncuaqmd.specialdistrict.org/files/6f1ad639b/NCUAQMD+Attainment+Plan+5-95.pdf.

Ocean Protection Council. 2024. *State of California Sea Level Rise Guidance, 2024 Science & Policy Update*. Accessed March 2026. https://opc.ca.gov/wp-content/uploads/2024/05/California-Sea-Level-Rise-Guidance-2024-508.pdf

OEHHA (Office of Environmental Health Hazard Assessment). 2015. *Air Toxics Hot Spots Program Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments*. February 2015. Accessed November 2025. https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf.

OEHHA. 2021. CalEnviroScreen 4.0. Accessed November 2025. https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4_0.

Pacific Gas and Electric. 2011. Report on the Analysis of the Shoreline Fault Zone, Central Coastal California. Report to the U.S. Nuclear Regulatory Commission. January 2011. Accessed November 2025. https://www.nrc.gov/docs/ML1101/ML110140425.pdf.

Padre (Padre Associates Inc). 2024. AT&T Japan-U.S. Cable Network Decommissioning (Cable Segments 8 and 9), Environmental Analysis and Technical Studies, Offshore Montana de Oro (San Luis Obispo County) and Manchester (Mendocino County), California. Prepared for AT&T c/o Paul Hastings, LLP, December 2024. Project No. 2302-1441.

PBDB (Paleobiology Database). 2025. Browse data search terms: State = "California", County = "San Luis Obispo". Accessed November 2025. https://paleobiodb.org/classic/displaySearchColls.

SAE (SAE International). 2025. SAE J1970 and SAE J2005: Sound Level Measurement Procedures for Recreational Motorboats. SAE International, latest reaffirmation August 2025.

San Luis Coastal Unified School District. 2025. "Our Schools." Accessed November 2025. https://www.slcusd.org/our-schools.

San Luis Obispo County Fire Department. 2025. "Home". Accessed November 2025. https://calfireslo.org/.

San Luis Obispo County Integrated Waste Management Authority. 2025. "Landfills and Transfer Stations." Accessed November 2025. https://www.iwma.com/landfills-and-transfer-stations.

San Luis Obispo County Sheriff's Office. 2025. "About Us." Accessed November 2025. https://www.slosheriff.org/about-us/.

Seafloor Surveys Inc. 1999. Japan-U.S. Cable Route Survey, Segments 8 and 9, dated March 14.

SLOAPCD (San Luis Obispo County Air Pollution Control District). 2001. *2001 Clean Air Plan San Luis Obispo County*. Accessed March 4, 2026. https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/business/pdf/CAP.pdf.

SLOAPCD. 2023. *A Guide for Assessing the Air Quality Impacts For Projects Subject To CEQA Review, 2023 Administrative Update Version to APCD Board Adopted April 2012 Version.* Accessed December 2025. https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/CEQA%20Handbook%202023_Final.pdf.

SLOCOG (San Luis Obispo Council of Governments). 2023. 2023-2045 Regional Transportation Plan. Accessed February 2026. https://sanluiscog.sharepoint.com/sites/SLOCOGTeamFolder/Shared%

20Documents/Forms/AllItems.aspx?id=%2Fsites%2FSLOCOGTeamFolder%2FShared%20Documents%2FSLOCOG%20Website%20Files%2FPrograms%2FRegional%20Planning%2F2023%20RTP%2F2023%20RTP%5FFINAL%20DOCS%2F00%2D%202023%20RTP%20Final%20Adopted%2Epdf&parent=%2Fsites%2FSLOCOGTeamFolder%2FShared%20Documents%2FSLOCOG%20Website%20Files%2FPrograms%2FRegional%20Planning%2F2023%20RTP%2F2023%20RTP%5FFINAL%20DOCS&p=true&ga=1.

Southern California Earthquake Data Center. 2025. Earthquake Information, Hosgri Fault Zone. Accessed November 2025. https://scedc.caltech.edu/earthquake/hosgri.html.

State Parks (California State Parks). 2012. Montaña de Oro Brochure Webpage. Accessed November 2025. https://www.parks.ca.gov/pages/592/files/mdo-brochure-lr.pdf.

State Parks. 2025a. "Montaña de Oro State Park." Accessed November 2025. https://www.parks.ca.gov/?page_id=592.

State Parks. 2025b. "Manchester State Park." Accessed November 2025. https://www.parks.ca.gov/?page_id=437.

Stephens, G. 2026. Email. February 20, 2026.

Stine, S. 1994. Extreme and Persistent Drought in California and Patagonia during Mediaeval Time. Nature 369:546-549.

SVP (Society of Vertebrate Paleontology). 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. 11 p. Accessed November 2025. http://vertpaleo.org/PDFS/68/68c554bb-86f1-442f-a0dc-25299762d36c.pdf.

SWRCB (State Water Resources Control Board). 2019. Water Quality Control Plan, Ocean Waters of California. Established 1972, revised 2019. Accessed November 2025. https://www.waterboards.ca.gov/water_issues/programs/ocean/docs/oceanplan2019.pdf.

SWRCB. 2025a. Geotracker. Accessed November 2025. https://geotracker.waterboards.ca.gov/.

SWRCB. 2025b. List of "Active" CDO [Cease and Desist Orders] and CAO [Cleanup and Abatement Orders] from Water Board. Accessed November 2025. https://calepa.ca.gov/sitecleanup/corteselist/.

U.S. Census Bureau. 2023a. American Community Survey 2023 5-Year Estimates - Census Reporter Profile Page for Census Tract 130, San Luis Obispo, CA. Accessed November 2025. http://censusreporter.org/profiles/14000US06079013000-census-tract-130-san-luis-obispo-ca/.

U.S. Census Bureau. 2023b. American Community Survey2023 1-Year Estimates - Census Reporter Profile Page for San Luis Obispo County, CA. Accessed November 2025. http://censusreporter.org/profiles/05000US06079-san-luis-obispo-county-ca/.

U.S. Census Bureau. 2023c. American Community Survey 2023 1-Year Estimates - Census Reporter Profile Page for California. Accessed November 2025. http://censusreporter.org/profiles/04000US06-california/.

U.S. Census Bureau. 2023d. American Community Survey 2023: ACS 5-Year Estimates Data Profiles– Selected Economic Characteristics. Accessed November 2025. https://data.census.gov/table/ACSDP5Y2023.DP03?q=DP03&g=040XX00US06_050XX00US06045,06079_1400000US06045011102,06079013000.

U.S. Census Bureau. 2023e. American Community Survey 2023 5-Year Estimates - Census Reporter Profile Page for Census Tract 111.02, Mendocino, CA. Accessed November 2025. http://censusreporter.org/profiles/14000US06045011102-census-tract-11102-mendocino-ca/.

U.S. Census Bureau. 2023f. American Community Survey2023 1-Year Estimates - Census Reporter Profile Page for Mendocino County, CA. Accessed November 2025. http://censusreporter.org/profiles/05000US06045-mendocino-county-ca/.

USGS (U.S. Geological Survey). 2017. Geologic Maps of US States. Accessed November 2025. https://mrdata.usgs.gov/geology/state/.

USGS. 2025. Areas of Land Subsidence in California. Accessed November 2025. https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html.

Wagner, H.R. 1929. Spanish Voyages to the Northwest Coast of American in the Sixteenth Century. California Historical Society, San Francisco.

Waugh, J. C. 2003. On the Brink of Civil War: The Compromise of 1850 and How It Changed the Course of American History. Wilmington, Delaware: Scholarly Resources Inc.

White, G. G., D. A. Fredrickson, L. D. Hagar, J. Meyer, J. S. Rosenthal, M. R. Waters, G. I. West, and E. Wohlgemuth. 2002. Cultural Diversity and Culture Change in Prehistoric Clear Lake Basin: Final Report of the Anderson Flat Project. Center for Archaeological Research at Davis Publication no. 13. University of California, Davis.

Wiegers, M.O. 2009. Geologic Map of the Morro Bay South 7.5' Quadrangle, San Luis Obispo County, California: A digital database. California Geological Survey, Preliminary Geologic Maps PGM-09-03. 1:24,000 scale. https://ngmdb.usgs.gov/Prodesc/proddesc_87143.htm.